

EXHIBIT 3

MONTHLY FEE STATEMENTS

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 7
ALEXANDER E. JONES,	§	
	§	Case No. 22-33553 (CML)
Debtor.	§	
	§	

**FIRST MONTHLY FEE STATEMENT OF PORTER HEDGES LLP, AS BANKRUPTCY
COUNSEL FOR CHAPTER 7 TRUSTEE, CHRISTOPHER R. MURRAY, FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR
THE PERIOD FROM JUNE 12, 2024 THROUGH JUNE 30, 2024**

Name of Applicant:	Porter Hedges LLP, as proposed Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray
Date of Retention Order:	Application Pending ¹
Period for which Fees and Expenses are Incurred:	June 12, 2024 through and including June 30, 2024
Interim Fees Incurred:	\$91,545.50
Interim Payment of Fees Requested (80%):	\$73,236.40
Interim Expenses Incurred:	\$539.12
Total Fees and Expenses Due:	\$73,775.52

This is the First Monthly Fee Statement.

¹ The Trustee's application to employ Porter Hedges was filed at Docket No. 756.

Porter Hedges LLP (“Porter Hedges”), as Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray (the “Trustee”), submits this First Monthly Fee Statement (the “Fee Statement”) for the period from June 12, 2024 through June 30, 2024 (the “Application Period”) in accordance with the proposed *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Trustee* [pending, motion filed at Docket No. 757] (the “Interim Compensation Order”).

Porter Hedges requests compensation for professional services rendered in the amount of \$91,545.50 (the “Fees”), and for reimbursement of out-of-pocket expenses incurred in the amount of \$539.12 (the “Expenses”), for the period from June 12, 2024 through June 30, 2024. Eighty percent (80%) of the fees equals \$73,236.40 and one hundred percent (100%) of the Expenses equals \$539.12 for a total requested amount of \$73,775.52.

Summaries of the calculations for these fees by project category and expenses are attached hereto as **Exhibit 1** and **Exhibit 2**, respectively. A summary of the time expended by Porter Hedges attorneys and support staff, together with their respective hourly rates, is attached hereto as **Exhibit 3**. Porter Hedges’ invoice for the Application Period is attached hereto as **Exhibit 4**.

WHEREFORE, Porter Hedges respectfully requests payment and reimbursement in accordance with the procedures set forth in the proposed Interim Compensation Order (*i.e.*, payment of eighty percent (80%) of the compensation sought, in the amount of \$73,236.40 and reimbursement of one hundred percent (100%) of expenses incurred in the amount of \$539.12 in the total amount of \$73,775.52.

Dated: July 19, 2024
Houston, Texas

Respectfully Submitted,

By: /s/ Joshua W. Wolfshohl

PORTER HEDGES LLP

Joshua W. Wolfshohl (TX Bar No. 24038592)

1000 Main St., 36th Floor

Houston, Texas 77002

Telephone: (713) 226-6000

Facsimile: (713) 226-6248

jwolfshohl@porterhedges.com

Counsel for the Chapter 7 Trustee,

Christopher R. Murray

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on July 19, 2024.

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl

EXHIBIT 1**SUMMARY OF TIME EXPENDED BY PROJECT CATEGORY**

Project Category	Total Hours	Total Fees Requested
Asset Analysis/Recovery	69.70	50,970.50
Case Administration	2.00	1,890.00
Employment/Fee Application	15.10	9,437.50
Litigation/Contested Matters	38.00	26,171.00
Meetings and Communications with Creditors	3.70	3,076.50
TOTAL	128.50	91,545.50

EXHIBIT 2

SUMMARY OF OUT-OF-POCKET EXPENSES

Expenses	Cost
Computer Assisted Legal Research	\$242.87
Reproduction	\$296.25
TOTAL	\$539.12

EXHIBIT 3**SUMMARY OF TIME EXPENDED BY ATTORNEYS AND SUPPORT STAFF**

Professional	Hourly Rate	Total Hours
Joshua W. Wolfshohl	\$945.00	42.10
Adam K. Nalley	\$900.00	2.20
Michael B. Dearman	\$625.00	27.10
Jordan T. Stevens	\$595.00	10.20
Kenesha L. Starling	\$575.00	45.20
Mitzie L. Webb	\$465.00	1.60
Eliana Garfias	\$405.00	.10
TOTAL		128.50

PORTER HEDGES LLP

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Date 07/18/24
018577-0001
JOSHUA W. WOLFSTOHL

ATTN: CHRIS MURRAY

TAX ID# 74-2174193

Alex Jones

Invoice Summary

Professional Services	\$91,545.50
Disbursements	539.12
Total Current Invoice	<u>\$92,084.62</u>
TOTAL AMOUNT DUE	<u><u>\$92,084.62</u></u>

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TAX ID# 74-2174193

For professional services rendered and related expenses incurred in the above-referenced matter through June 2024, as follows:

Date	Tkpr	Description	Hours	Amount
06/12/24	MBD	Compile interested parties list for conflicts check for Alex Jones and Free Speech Systems bankruptcies; correspond with J. Wolfshohl regarding same.	1.00	625.00
06/14/24	JWW	Attend conversion hearing on FSS and phone conferences and emails with C. Murray regarding same.	1.50	1,417.50
06/15/24	JWW	Review information provided by various parties (.5); conference call with C. Murray and E. Jones regarding same and next steps (1.0).	1.50	1,417.50
06/16/24	MBD	Review and organize conversion hearing exhibits from Alex Jones conversion hearing (1.2); correspond with J. Wolfshohl regarding same (.1); analyze case law governing LLC management issues (2.0); correspond with J. Wolfshohl with findings on same (.5).	3.80	2,375.00
06/16/24	JWW	Emails with various parties regarding budget and payment issues (.5); conference with Debtor's counsel and FSS representatives regarding same (.5).	1.00	945.00
06/17/24	MBD	Review and analyze Alex Jones and FSS schedules and petitions (.2); correspond with J. Wolfshohl regarding ownership of FSS (.1).	0.30	187.50
06/17/24	JWW	Phone conference and emails regarding open issues in FSS case (.5); conference with L. Freeman regarding same (.4); emails regarding payment of pre-dismissal expense (.3); conference with FSS team regarding open issues (1.0); further emails and phone conference with L. Freeman (.4); conference with C. Murray regarding same (.6); emails regarding meeting with A. Jones team (.2); review LLC issues and emails regarding same (.6).	4.00	3,780.00

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Date	Tkpr	Description	Hours	Amount
06/18/24	MBD	Conference with C. Murray, E. Jones, J. Wolfshohl, J. Stevens, and FSS professionals regarding case status and company status (3.0); analyze interim compensation procedures and AXOS turnover motion and responses (.2).	3.20	2,000.00
06/18/24	JTS	Prepare for (including by review relevant bankruptcy filings) and attend extend strategy session with C. Murray, E. Jones, J. Wolfshohl, and M. Dearman.	5.70	3,391.50
06/18/24	JWW	Emails and phone conference regarding open issues with FSS cash and budget (.8); meet with Trustee team regarding same (1.2); meet with FSS and A. Jones financial advisers and counsel regarding options for FSS (2.0); further emails regarding open issues (.3).	4.30	4,063.50
06/19/24	MBD	Review case status notes and draft task list (1.0); correspond with J. Wolfshohl and J. Stevens regarding same (.2).	1.20	750.00
06/19/24	JWW	Conference with L. Freeman regarding open issues (.6); several emails regarding open case issues and work streams (.4); emails with counsel for plaintiffs regarding next steps in case (.2); conference with J. Martin regarding same (.3); conference with E. Jones regarding open issues with FSS (.2); conference with W. Cicak regarding funding and plan for FSS (.5); emails regarding further issues with FSS (.5).	2.70	2,551.50

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Date	Tkpr	Description	Hours	Amount
06/20/24	MBD	Correspond with PH team regarding task/issue list (.2); review updates on A. Jones dischargeability issues (.2); conference with K. Starling regarding case status (.5); multiple correspondence with J. Stevens and K. Starling regarding arbitration and appellate issues (.3); analyze case summaries on appellate issues in bankruptcy (.3); conference with K. Starling regarding arbitration and appellate issues (.2).	1.70	1,062.50
06/20/24	KLS	Teams call with M. Dearman to obtain case background (.4); review and prepare case summaries for J. Wolfshohl (3.3).	3.70	2,127.50
06/20/24	JTS	Prepare for and attend call between C. Murray, E. Jones, members of the Porter Hedges Team, and counsel to various stakeholders (.9); review and analyze the docket in the FSS case and the Chapter 7 case (.3).	1.20	714.00
06/20/24	JWW	Coordinate work streams with PH team and review various issues (.4); conference call with Connecticut plaintiffs (.8); phone conference with E. Jones and C. Murray regarding FSS and next steps (.5); review LLC authority issue (.3); conference with E. Jones regarding FSS issues (.5).	2.50	2,362.50
06/21/24	MBD	Attend to multiple correspondence with J. Stevens and K. Starling regarding appellate issues.	0.20	125.00
06/21/24	KLS	Call with J. Wolfshohl regarding Motion to Transfer Venue (.1); call with J. Wolfshohl regarding Emergency Motion to Compel and Enforce Dismissal Order (.1); draft Emergency Motion to Compel and Enforce Dismissal Order (4.0); begin initial draft of Motion to Remove and research regarding same (2.1).	6.30	3,622.50

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Date	Tkpr	Description	Hours	Amount
06/21/24	JTS	Review and analyze Judge Lopez's Order dismissing the FSS case (.7); review and analyze the pleadings in the various state court cases filed against Jones and FSS, and correspond with members of the Porter Hedges Team regarding the same (1.3).	2.00	1,190.00
06/21/24	JWW	Emails and phone conference with J. Martin regarding FSS issues (.5); phone conference with E. Jones regarding same (.5); phone conference with C. Murray regarding funds transfer (.1); work on removal document and motion to transfer (.5); phone conferences with A. Catmull regarding same (.2); conference with K. Starling regarding motion to enforce dismissal order (.2); review turnover motion and order and multiple emails with trustee team regarding strategy (.8); emails regarding FSS governance (.2).	3.00	2,835.00
06/22/24	MBD	Multiple correspondence with J. Wolfshohl and A. Nalley regarding resolutions (.3); conference with A. Nalley regarding same (.2); draft resolutions (.5); review and revise resolutions (.5); correspond with C. Murray and E. Jones regarding same (.1).	1.60	1,000.00
06/22/24	AKN	Confer with J. Wolfshohl and M. Dearman regarding factual background and required entity actions (.2); review provisions of operating agreement of Free Speech Systems in order to determine various management and approval matters (.8); review and revise drafts of written consent of sole manager and sole member of Free Speech Systems to replace manager and approve certain wind down matters (1.0); confer with J. Wolfshohl and M. Dearman regarding revisions to the same (.2).	2.20	1,980.00

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Date	Tkpr	Description	Hours	Amount
06/22/24	KLS	Call with J. Wolfshohl regarding Emergency Motion to Compel and Enforce Dismissal Order (.3); revise Emergency Motion to Compel and Enforce Dismissal Order (8.0).	8.30	4,772.50
06/22/24	JWW	Emails regarding removal and motion to be filed seeking enforcement of dismissal order (.5); work on resolutions for FSS and emails with PH team regarding same (.7); conference with E. Jones and C. Murray regarding motion to enforce order and extend stay and FSS resolutions (.9); conference call with K. Starling regarding same (.2); review and revise draft motion and emails with C. Murray and E. Jones regarding same (.8); conference with L. Freeman regarding turnover order and related issues (.3); further emails with trustee team regarding open issues (.3).	3.70	3,496.50
06/23/24	MBD	Begin draft PH retention application (1.0); begin draft interim compensation motion and order (2.4); correspond with J. Wolfshohl regarding same (.1).	3.50	2,187.50
06/23/24	KLS	Finalize Emergency Motion regarding Dismissal Order.	6.10	3,507.50
06/23/24	MLW	Email exchanges regarding filing of Emergency Motion to Clarify Transfer of Control (.2); confer with J. Wolfshohl and K. Starling regarding notice language (.2); receive and file (.3); forward copy to Court Case Manager (.1).	0.80	372.00
06/23/24	JWW	Emails and phone conferences with K. Starling regarding emergency motion and review and revise same for filing.	3.00	2,835.00

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TAX ID# 74-2174193

Date	Tkpr	Description	Hours	Amount
06/24/24	MBD	Continue draft PH retention application and Wolfshohl declaration (1.8); review conflicts checks (1.5); correspond with C. Murray and E. Jones regarding interim compensation motion (.1); conference with PH team regarding case status and task list (.3); conference with J. Steven and K. Starling regarding same and case strategy (.9); update task list and circulate to PH team (.2).	4.80	3,000.00
06/24/24	KLS	Teams call with J. Stevens and M. Dearman regarding tasks list	2.80	1,610.00
06/24/24	JTS	Revise and supplement the Porter Hedges outstanding task list, including in light of pending filings in the FSS proceeding and the Jones proceeding (.9); prepare for and attend a strategy session with J. Wolfshohl, M. Dearman, and K. Starling (.4).	1.30	773.50
06/24/24	JWW	Several emails with trustee team regarding filing of motion, status of removal and issues with state court proceeding (.5); work on open issues in case and conference with K. Starling regarding motion to transfer venue in removed case (.5); correspond with C. Murray and E. Jones regarding discussions with various parties regarding extension of stay (.6); emails with counsel for Connecticut plaintiffs regarding same (.3); further emails with Court and other parties regarding hearing on emergency motion and related issues (.5).	2.40	2,268.00
06/25/24	MBD	Correspond with Y. McCullar regarding updated conflicts check (.2); update conflicts list (.4); continue draft PH employment application (.4).	1.00	625.00

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Date	Tkpr	Description	Hours	Amount
06/25/24	KLS	Preparation for hearing regarding Trustee's Emergency Motion including preparation of Witness and Exhibit List and review of Plaintiff's Response and Connecticut Families' Statement in support of Motion (2.5); continue draft of motions to transfer venue and research in support of same (4.0).	6.50	3,737.50
06/25/24	JWW	Work on issues related to removal and notification to state court (.4); conference with E. Jones and C. Murray regarding same and strategy for hearing (.5); review notice of hearing and emails with various parties regarding same (.5); conferences and emails with K. Starling regarding motion to transfer venue of removed case, witness and exhibit list and related issues (.6); emails with various parties regarding hearing and open FSS issues (.4); conference with C. Murray regarding same (.2); review stipulation and emails regarding same (.2).	2.80	2,646.00
06/26/24	EG	Correspondence on filing of witness/exhibit list.	0.10	40.50
06/26/24	KLS	Finalize Witness and Exhibit List for hearing on Trustee's Emergency Motion (1.3) continue draft of motions to transfer venue and research in support of same (6.2).	7.50	4,312.50
06/26/24	MLW	Email exchanges with K. Starling regarding witness/exhibit list for June 27th hearing (.2); review/finalize and file witness/exhibit list (.6).	0.80	372.00
06/26/24	JWW	Emails and phone conferences with trustee team regarding hearing preparation (.8); conference with Connecticut plaintiffs regarding same (.6); work on witness/exhibit list for hearing (.3); conference with E. Jones and C. Murray regarding hearing strategy (.8); review pleadings and transcript in preparation for hearing (1.3).	3.80	3,591.00

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TAX ID# 74-2174193

Date	Tkpr	Description	Hours	Amount
06/27/24	MBD	Continue draft PH retention application and Wolfshohl declaration (1.5); continue review conflicts check (.5); draft exhibits to PH retention application (.4); multiple correspondence with K. Starling and J. Stevens regarding hearing outcomes and next steps (.2).	2.60	1,625.00
06/27/24	KLS	Attend hearing regarding Trustee's Emergency Motion concerning Dismissal Order (.5); continue initial draft of motions to transfer venue (3.5).	4.00	2,300.00
06/27/24	JWW	Prepare for hearing on emergency motion (1.3); attend hearing (.6); conference with B. Wolf regarding interest in purchase of website and IP (.3); several emails regarding other open issues in case (.4).	2.60	2,457.00
06/28/24	MBD	Update task list (.2); review June 27, 2024 hearing recording (.2); review supplemental conflicts check (.3); correspond with C. Murray regarding interim compensation motion and employment application (.1); finish drafting Wolfshohl declaration (.3); correspond with PH team regarding employment application and task list (.1); pull case files and correspond with PH team regarding same (.4).	1.60	1,000.00
06/28/24	JWW	Several emails with various parties regarding operational issues (.4); emails with trustee team regarding open task list and review same and circulate for discussion (.3); conference call with E. Jones and C. Murray regarding strategy for coming weeks and priority of action items (1.4); emails with PH team regarding next steps in case (.2); emails with Akin regarding investigation materials and related issues (.2); emails with W. Cicak regarding sale issues (.1); emails with A. Catmull regarding withdrawal and prior communications regarding same (.2).	2.80	2,646.00

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JOSHUA W. WOLFSHOHL

TAX ID# 74-2174193

Date	Tkpr	Description	Hours	Amount
06/29/24	MBD	Revise PH retention application and Wolfshohl declaration (.3); correspond with J. Wolfshohl regarding same (.1); correspond with C. Murray regarding same (.2)	0.60	375.00
06/29/24	JWW	Emails regarding operational issues with FSS (.1); review employment application and emails regarding same (.4).	0.50	472.50
Total Services			128.50	\$91,545.50

Timekeeper Summary

<u>Attorney/Legal Assistant</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
AKN Adam K. Nalley	Partner	2.20	900.00	1,980.00
JWW Joshua W. Wolfshohl	Partner	42.10	945.00	39,784.50
JTS Jordan T. Stevens	Associate	10.20	595.00	6,069.00
KLS Kenesha L. Starling	Associate	45.20	575.00	25,990.00
MBD Michael B. Dearman	Associate	27.10	625.00	16,937.50
EG Eliana Garfias	Paralegal	0.10	405.00	40.50
MLW Mitzie L. Webb	Paralegal	1.60	465.00	744.00

Disbursements Summary

Description	Value
Computer Assisted Legal Research	242.87
Reproduction	296.25
Total Disbursements	\$539.12

Invoice Total	\$92,084.62
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 7
ALEXANDER E. JONES,	§	
	§	Case No. 22-33553 (CML)
Debtor.	§	
	§	

**SECOND MONTHLY FEE STATEMENT OF PORTER HEDGES LLP, AS
BANKRUPTCY COUNSEL FOR CHAPTER 7 TRUSTEE, CHRISTOPHER R.
MURRAY, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES FOR THE PERIOD FROM JULY 1, 2024 THROUGH JULY 31, 2024**

Name of Applicant:	Porter Hedges LLP, as proposed Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray
Date of Retention Order:	July 30, 2024 (Doc. No. 792) ¹
Period for which Fees and Expenses are Incurred:	July 1, 2024 through and including July 31, 2024
Interim Fees Incurred:	\$108,569.50
Interim Payment of Fees Requested (80%):	\$86,855.60
Interim Expenses Incurred:	\$1,930.04
Total Fees and Expenses Due:	\$88,785.64

This is the Second Monthly Fee Statement.

¹ The Trustee's application to employ Porter Hedges was filed at Docket No. 756.

Porter Hedges LLP (“Porter Hedges”), as Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray (the “Trustee”), submits this Second Monthly Fee Statement (the “Fee Statement”) for the period from July 1, 2024 through July 31, 2024 (the “Application Period”) in accordance with the proposed *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Trustee* [Docket No. 793] (the “Interim Compensation Order”).

Porter Hedges requests compensation for professional services rendered in the amount of \$108,569.50 (the “Fees”), and for reimbursement of out-of-pocket expenses incurred in the amount of \$1,930.04 (the “Expenses”), for the period from July 1, 2024 through July 31, 2024. Eighty percent (80%) of the fees equals \$86,855.60 and one hundred percent (100%) of the Expenses equals \$1,930.04 for a total requested amount of \$88,785.64.

Summaries of the calculations for these fees by project category and expenses are attached hereto as **Exhibit 1** and **Exhibit 2**, respectively. A summary of the time expended by Porter Hedges attorneys and support staff, together with their respective hourly rates, is attached hereto as **Exhibit 3**. Porter Hedges’ invoice for the Application Period is attached hereto as **Exhibit 4**.

WHEREFORE, Porter Hedges respectfully requests payment and reimbursement in accordance with the procedures set forth in the proposed Interim Compensation Order (*i.e.*, payment of eighty percent (80%) of the compensation sought, in the amount of \$86,855.60 and reimbursement of one hundred percent (100%) of expenses incurred in the amount of \$1,930.04 in the total amount of \$88,785.64.

Dated: August 12, 2024
Houston, Texas

Respectfully Submitted,

By: /s/ Joshua W. Wolfshohl

PORTER HEDGES LLP

Joshua W. Wolfshohl (TX Bar No. 24038592)

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Houston, Texas 77002

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Facsimile: (713) 226-6248

jwolfshohl@porterhedges.com

Counsel for the Chapter 7 Trustee,

Christopher R. Murray

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on August 12, 2024.

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl

EXHIBIT 1

SUMMARY OF TIME EXPENDED BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees Requested
Asset Analysis/Recovery	130.10	89,337.50
Case Administration	1.90	922.50
Employment/Fee Application	1.20	486.00
Litigation/Contested Matters	27.90	17,823.50
TOTAL	161.10	108,569.50

EXHIBIT 2

SUMMARY OF OUT-OF-POCKET EXPENSES

Expenses	Cost
Computer Assisted Legal Research	\$1,927.14
Reproduction	\$.45
Filing Fees	\$2.45
TOTAL	\$1,930.04

EXHIBIT 3

SUMMARY OF TIME EXPENDED BY ATTORNEYS AND SUPPORT STAFF

Professional	Hourly Rate	Total Hours
Joshua W. Wolfshohl	\$945.00	29.70
Sarah J. Ring	\$925.00	1.00
Adam K. Nalley	\$900.00	6.50
Jason T. Lloyd	\$900.00	.90
Christine M. McMillan	\$785.00	2.60
Michael B. Dearman	\$625.00	53.00
Jordan T. Stevens	\$595.00	12.40
Kenesha L. Starling	\$575.00	46.30
Mitzie L. Webb	\$465.00	3.80
Eliana Garfias	\$405.00	4.90
TOTAL		161.10

PORTER HEDGES LLP

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Date 08/08/24
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JOSHUA W. WOLFSTOHL

ATTN: CHRIS MURRAY

TAX ID# 74-2174193

Alex Jones

Invoice Summary

Professional Services	\$108,569.50
Disbursements	1,930.04
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Total Current Invoice	\$110,499.54
 TOTAL AMOUNT DUE	 <u><u>\$110,499.54</u></u>

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TAX ID# 74-2174193

For professional services rendered and related expenses incurred in the above-referenced matter through July 2024, as follows:

Date	Tkpr	Description	Hours	Amount
07/01/24	MBD	Analyze divorce decree and related transactions.	0.90	562.50
07/01/24	KLS	Continue initial draft of motions to transfer venue (1.5); Team call regarding chapter 7 and 11 filings (.5).	2.00	1,150.00
07/01/24	JWW	Conference with Akin Gump regarding investigation and turnover of information (.4); emails with PH team regarding same (.1).	0.50	472.50
07/02/24	MBD	Analyze conversion schedules and divorce decree (.6); finalize PH employment application and interim compensation order for filing (.4); correspond with M. Webb and E. Garfias regarding same (.1).	1.10	687.50
07/02/24	KLS	Review the UCC's disclosure statement.	4.40	2,530.00
07/02/24	JTS	Prepare for and speak with K. Starling regarding the claims investigation (.3); review and analyze documents related to the same (.2).	0.50	297.50
07/03/24	MBD	Conference with C. Murray, E. Jones, J. Chiba, and PH team regarding bankruptcy status (.9); correspond with A. Nalley regarding corporate law inquiries (.2); conference with A. Nalley regarding wind down issues (.2); review statutes and case law governing winddowns and assignments for the benefit of creditors (1.2); correspond with C. Murray and E. Jones regarding same (.2); analyze case law governing right to publicity (.3).	3.00	1,875.00
07/03/24	KLS	Attend weekly strategy call via Teams.	0.90	517.50

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Date	Tkpr	Description	Hours	Amount
07/03/24	JTS	Prepare for and attend strategy session with C. Murray, E. Jones, and Members of the Porter Hedges Team (.9); conduct legal research and analysis regarding attorney-client privilege issues in connection with C. Murray's investigate efforts (1.9).	2.80	1,666.00
07/03/24	EG	Correspondence on filing logistics of PH retention application and interim compensation motion (.2); discuss same with M. Webb (.2); receive, review, and electronically file application along with interim motion with court (.3); download and circulate filed versions (.1); coordinate service of same (.1); update file (.1).	1.00	405.00
07/03/24	AKN	Review correspondence regarding option of dissolving entity and impact of same under law and operating agreement; confer with M. Dearman regarding the same.	0.80	720.00
07/05/24	MBD	Correspond with S. Ring regarding intellectual property issues (.2); continue analyzing case law governing same (.5); analyze premarital agreement (.8).	1.50	937.50
07/05/24	KLS	Review A. Jones prenuptial agreement.	2.40	1,380.00
07/05/24	SJR	Correspondence with M. Dearman regarding name, image and likeness (.3); discuss the same with colleagues (.7).	1.00	925.00
07/08/24	MBD	Conference with S. Ring regarding intellectual property issues (.2); correspond with C. Murray and E. Jones regarding same (.2); correspond with C. Murray and E. Jones regarding wind down (.1); analyze case law regarding substantive consolidation (.5); draft analysis of substantive consolidation (.4).	1.40	875.00
07/08/24	JWW	Correspond with C. Murray regarding open issues in case (.2); emails with PH team regarding IP issues and substantive consolidation issues (.2).	0.40	378.00

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Date	Tkpr	Description	Hours	Amount
07/09/24	MBD	Correspond with C. Murray regarding substantive consolidation (.5); conference with J. Wolfshohl regarding case status and outstanding research questions (.4); continue analyzing case law governing intellectual property rights (.1).	1.00	625.00
07/09/24	KLS	Teams call with J. Wolfshohl and J. Stevens (.9); begin initial draft subpoena to the UCC (1.1).	2.00	1,150.00
07/09/24	JTS	Prepare for and attend strategy session with J. Wolfshohl, M. Dearman, and K. Starling.	0.90	535.50
07/09/24	JWW	Phone conference with J. Martin regarding FSS wind down issues and pending removed case (.3); phone conference with M. Dearman regarding open issues related to fee applications, claims analysis and other matters (.3); conference with PH team regarding various work streams (.9); emails with C. Murray regarding same (.2); emails with counsel for CT plaintiffs (.2).	1.90	1,795.50
07/10/24	MBD	Attend conference call with Paul Weiss team regarding bankruptcy case status and open issues (1.1); review fee applications filed in FSS and Jones cases (1.0); draft potential objection spreadsheet regarding same (.8); correspond with J. Wolfshohl regarding same (.1); analyze case law and legal issues related to intellectual property sale (1.0); review, analyze, and comment on draft protective order (2.0).	6.00	3,750.00
07/10/24	KLS	Zoom call regarding Alex Jones (1.1); continue initial draft subpoena to UCC (2.2).	3.30	1,897.50
07/10/24	JTS	Prepare for and attend discussion with Paul Weiss regarding their clients' position and a potential path forward.	0.70	416.50
07/10/24	EG	Correspondence on upcoming deadlines related to retention application and interim compensation motion (.1); update calendar accordingly (.1).	0.20	81.00

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Date	Tkpr	Description	Hours	Amount
07/10/24	JWW	Emails and phone conference with PH team regarding open issues in case (.4); conference with C. Murray and E. Jones regarding same and next steps with FSS and related issues (1.0); conference with CT plaintiffs' counsel regarding same (1.2); follow-up correspondence with Trustee team (.3).	2.90	2,740.50
07/11/24	MBD	Analyze fee applications in Alex Jones and FSS cases (1.0); analyze on intellectual property issues (.5); participate in update call with PH team and Trustee team (.9); correspond with K. Starling regarding protective order (.2); begin draft bid procedures and sale order (.5); draft protective order (1.5).	4.60	2,875.00
07/11/24	KLS	Weekly call via Teams(.9); complete initial draft of subpoena to UCC (2.4).	3.30	1,897.50
07/11/24	JTS	Prepare for and attend strategy session with C. Murray, E. Jones, and Members of the Porter Hedges Team.	0.90	535.50
07/11/24	JWW	Emails regarding UCC subpoena (.2); emails regarding professional fee objection extension and review chart regarding status of paid and unpaid professional fees and consider strategy for comprehensive approach (.4); conference call with Trustee team regarding various work streams and related open issues in case regarding FSS, removed cases and fee objections (.9); follow-up emails regarding same (.3).	1.80	1,701.00
07/12/24	KLS	Revise initial draft of subpoena to UCC.	1.20	690.00
07/12/24	JWW	Work on UCC subpoena and emails trustee team regarding same (.5); emails regarding open issues with fee applications (.1); emails regarding sale strategy (.2).	0.80	756.00
07/14/24	MBD	Continue draft protective order.	1.60	1,000.00
07/14/24	JWW	Emails regarding UCC subpoena and other open issues in case.	0.20	189.00

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Date	Tkpr	Description	Hours	Amount
07/15/24	MBD	Correspond with J. Wolfshohl regarding sale (.2); continue draft protective order (1.0); correspond with J. Wolfshohl regarding same (.1); continue draft bid procedures motion and order (.2).	1.50	937.50
07/15/24	JWW	Phone conference with C. Murray regarding call with UST (.2); conference call with UST regarding options with FSS (.5); further call with C. Murray and E. Jones regarding same (.6); conference with J. Martin regarding meeting with Texas plaintiffs (.2); emails regarding UCC subpoena (.1).	1.60	1,512.00
07/16/24	MBD	Conference with J. Wolfshohl regarding protective order and related issues (.1); correspond with C. Murray and E. Jones regarding same (.1); continue draft sale motion (.2).	0.40	250.00
07/16/24	KLS	Teams call regarding subpoena to the UCC (.5); revise subpoena to the UCC (.6).	1.10	632.50
07/16/24	JWW	Prepare for call with Akin (.2); conference call with Akin regarding subpoena and related issues (.5); further call with K. Starling (.1); several emails regarding open issues in case (.2); work on fee statement (.3).	1.30	1,228.50
07/17/24	MBD	Analyze case law governing sale of non-estate assets (1.0); continue draft bid procedures motion (2.0); conference with J. Wolfshohl regarding same (.2); revise protective order (.1).	3.30	2,062.50
07/17/24	KLS	Further revise initial draft of UCC subpoena.	0.40	230.00
07/17/24	JWW	Work on subpoena and emails with counsel for sub-V trustee regarding same (.3); emails regarding meeting with Texas plaintiffs and related issues (.2); conference with M. Dearman regarding bid procedures and issues related to FSS (.3); emails regarding numerous operational issues and related matters (.3).	1.10	1,039.50

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Date	Tkpr	Description	Hours	Amount
07/18/24	MBD	Conference call with Trustee team and PH team regarding case status (1.0); revise exhibit to protective order (.3); correspond with opposing counsel regarding protective order (.2); review PQPR claims (.2).	1.70	1,062.50
07/18/24	KLS	Teams weekly status call.	1.00	575.00
07/18/24	JWW	Review subpoena and emails with K. Starling regarding same (.2); emails with Akin regarding meeting (.1); review APA from W. Cicak and emails regarding same (.4); conference with C. Murray and E. Jones regarding meeting in Austin and various open issues (.5); follow-up emails (.3).	1.50	1,417.50
07/19/24	MBD	Correspond with J. Wolfshohl regarding fee application objections and update calendar regarding same (.2); analyze FSS asset sale issues (.8); correspond with J. Lloyd regarding PQPR lien issues (.4); analyze Infowars data privacy policy and correspond with C. Murray regarding same (.6); respond to C. McMillan questions regarding PQPR (.4); review PQPR adversary proceeding pleadings and correspond with J. Wolfshohl and C. McMillan regarding same (1.1).	3.50	2,187.50
07/19/24	JTL	Review background information and summary received from M. Dearman (.1); begin reviewing PQPR loan documents (.4).	0.50	450.00
07/19/24	CMM	Begin review of FSS loan documentation.	1.40	1,099.00
07/19/24	JWW	Meet with counsel for Texas plaintiffs regarding open issues in case (2.2); follow-up meeting with Trustee and E. Jones regarding action items (.3); emails regarding same (.2).	2.70	2,551.50

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Date	Tkpr	Description	Hours	Amount
07/22/24	MBD	Conference with J. Lloyd and C. McMillian regarding PQPR (.4); correspond with J. Wolfshohl regarding same (.1); continue draft sale motion and order (2.5); conference with C. Murray regarding case strategy (.2); review and comment upon asset purchase agreement (1.1); multiple correspondence with J. Stevens and K. Starling regarding state court litigation (.2).	4.50	2,812.50
07/22/24	KLS	Continue draft of Trustee's Motions to Transfer Venue (11.1); begin drafts of Joint Motions for Extension of Time for Plaintiffs to draft Motions to Remand (1.5).	12.60	7,245.00
07/22/24	JTS	Review and analyze the documents filed in connection with the proceeding removed to the Western District of Texas (.6); conduct legal research and analysis regarding the motion to transfer and the motion to remand in connection with the same (1.8).	2.40	1,428.00
07/22/24	EG	Correspondence on transcript request for June 27, 2024 hearing.	0.20	81.00
07/22/24	MLW	Email exchanges regarding June 27th hearing transcript (.2); submit request for copy of same (.1).	0.30	139.50
07/22/24	JTL	Conference with M. Dearman et al. to discuss potential foreclosure options and related matters.	0.40	360.00
07/22/24	CMM	Prepare for and participate in call with J. Lloyd and M. Dearman regarding credit bidding.	1.20	942.00
07/22/24	AKN	Correspond with M. Dearman regarding draft of asset purchase agreement for sale of assets (.2); begin to review and revise draft of the same (1.5).	1.70	1,530.00

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Date	Tkpr	Description	Hours	Amount
07/22/24	JWW	Emails and phone conference with K. Starling regarding status of removed case, motion to transfer venue and related issues (.4); correspond with trustee regarding Cicak APA, negotiations over split between families of estate recoveries and related issues in case (.3); emails with M. Dearman regarding APA and other open issues (.2).	0.90	850.50
07/23/24	MBD	Conference with J. Wolfshohl and A. Nalley regarding APA.	0.40	250.00
07/23/24	KLS	Further revise subpoena to UCC (1.7); finalize and file Joint Motions for Extension of Time for Plaintiffs to file Motions to Remand (5.4).	7.10	4,082.50
07/23/24	EG	Correspondence on joint motion for extension of time (.2); receive, review, and discuss further revisions (.2); review final draft and electronically file same (.4); coordinate service of same (.1); update file (.1).	1.00	405.00
07/23/24	AKN	Confer with J. Wolfshohl and M. Dearman regarding status of case, possible sale of assets and review of related draft asset purchase agreement (.2); continue to review and revise draft of asset purchase agreement (1.3).	1.50	1,350.00
07/23/24	JWW	Emails and conference regarding Akin subpoena (.3); work on remand issues with Western District case and review and revise motion to abate and conferences with K. Starling regarding same (.9); conference with M. Dearman and A. Nalley regarding Cicak APA (.5); emails regarding FSS fee status (.2).	1.90	1,795.50
07/24/24	KLS	Revise proposed order Joint Motions for Extension of Time for Plaintiffs to draft Motions to Remand (1.1); further revise subpoena to UCC (3.1).	4.20	2,415.00

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Date	Tkpr	Description	Hours	Amount
07/24/24	JTS	Continue conducting legal research and analysis in connection with the efforts to transfer the proceeding in the Western District of Texas to the Southern District of Texas.	1.40	833.00
07/24/24	EG	Correspondence on submission of revised proposed orders (.2); receive, review, and upload same per local rules (.2); follow up emails on submission of same (.1).	0.50	202.50
07/24/24	MLW	Email exchanges and phone conferences with K. Starling regarding logistics for preparing and serving subpoena on UCC (2.1); receive and review same (1.2); confer with J. Wolfshohl regarding same (.2).	3.50	1,627.50
07/24/24	JWW	Conference with K. Starling regarding Akin subpoena and issues with removed case (.2); emails with C. Murray regarding A. Jones agreement (.2); emails and phone conferences with K. Starling regarding subpoena and conference with M. Webb regarding same (.6)	1.00	945.00
07/25/24	MBD	Review motion to remand (.2); review upcoming deadlines and tasks (.1); conference with trustee and PH team regarding case updates (.6); review outstanding fee applications (.4); correspond with Trustee team regarding fee application objections (.2); correspond with FSS fee applicants regarding objection deadline extension (.4); conference with A. Catmull regarding fee objection deadline (.2); conference with J. Wolfshohl regarding stipulations (.1); begin draft stipulation extending deadlines (.3); multiple correspondence with J. Chiba regarding same (.2); review and revise L. Freeman stipulation (.2); correspond with A. Nalley regarding asset purchase agreement (.1); analyze case law related to property of the estate (.5); analyze debtor's schedules for liquidation purposes (.9).	4.40	2,750.00

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Date	Tkpr	Description	Hours	Amount
07/25/24	KLS	Attend hearing regarding removal of In re Case in Another District via Zoom.	0.40	230.00
07/25/24	JTS	Prepare for and attend strategy session with E. Jones, C. Murray, and members of the Porter Hedges Team (.6); continue conducting legal research and analysis in connection with the efforts to transfer the proceeding in the Western District of Texas to the Southern District of Texas (1.8); summarize and provide the results of the same to J. Wolfshohl (.4).	2.80	1,666.00
07/25/24	EG	Correspondence on notice of 2004 requests (.2); discuss same with M. Webb (.2); receive, review, and electronically file same with court (.2); download and circulate filed version (.1); update file (.1).	0.80	324.00
07/25/24	AKN	Continue to review and revise draft of asset purchase agreement.	1.00	900.00
07/25/24	JWW	Conference call with Trustee team regarding open issues (.6); prepare for hearing (.5); emails and phone conference with Texas and CT plaintiffs (.3); work on issues with 2004 notice to Akin (.3); attend hearing (.8); emails regarding sale issues (.3).	2.80	2,646.00

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Date	Tkpr	Description	Hours	Amount
07/26/24	MBD	Draft CNO on interim compensation (.1); prepare multiple CNOs and proposed orders for filing (.2); correspond with M. Webb and E. Garfias regarding same (.1); correspond with E. Jones, J. Wolfshohl, and J. Chiba regarding fee application stipulations (.2); conference with E. Freeman regarding fee applications (.2); revise M. Haselden and E. Freeman stipulations (.3); multiple correspondence with FSS fee applicants regarding stipulations (.5); revise MDJW stipulation (.3); review revise O'Connor Wechsler stipulation (.3); multiple correspondence with Trustee team regarding stipulations on fee applications (.5); conference with J. Wolfshohl regarding same (.1)	2.80	1,750.00
07/26/24	EG	Correspondence on CNOs to PH employment application and Jones Murray employment application along with stipulations (.3); receive, review, and electronically file same (.6); update file (.1); email case manager on submission of same (.2).	1.20	486.00
07/26/24	AKN	Review and revise draft of asset purchase agreement.	1.20	1,080.00
07/26/24	JWW	Correspond with C. Murray regarding open issues with FSS (.2); emails and phone conference with M. Dearman regarding FSS fee app objections and extension of deadlines (.3); emails with V. Driver regarding open issues (.1).	0.60	567.00
07/28/24	MBD	Review APA comments (.2); correspond with A. Nalley regarding same (.2); review schedules related to intellectual property (.5); review trademark registrations (.3); correspond with C. Murray regarding broker (.1); begin draft motion to employ broker (.3).	1.60	1,000.00

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Date	Tkpr	Description	Hours	Amount
07/29/24	MBD	Review and revise APA (.2); conference with A. Nalley and J. Wolfshohl regarding same (.2); correspond with C. Murray regarding same (.1); correspond and conference with K. Starling regarding Tranzon retention (.1); review and revise FSS advertising and promotion agreements (3.0); correspond with J. Wolfshohl, C. Murray, and E. Jones regarding same (.2); correspond with C. Murray and K. Starling regarding discovery (.1); correspond with K. Starling and J. Wolfshohl regarding protective order (.2); review and analyze Alex Jones schedules and statements of financial affairs (1.9); correspond with opposing counsel regarding protective order (.2).	6.20	3,875.00
07/29/24	AKN	Confer with J. Wolfshohl and M. Dearman regarding revisions to draft of asset purchase agreement.	0.30	270.00
07/29/24	JWW	Several emails with various parties regarding UCC subpoena and related issues with protective order (.4); emails and phone conference regarding sale structure (.4); emails regarding exemptions and extension of deadlines (.2).	1.00	945.00
07/30/24	MBD	Conference with V. Driver regarding protective order (.3); redline protective order (.2); attend to correspondence from Committee and K. Starling regarding protective order and document production (.2); correspond with S. Ring regarding intellectual property questions (.2).	0.90	562.50
07/30/24	JWW	Conference with CT plaintiffs regarding global resolution.	1.00	945.00
07/31/24	MBD	Conference with Tranzon regarding retention, sale, and auction.	0.70	437.50

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Date	Tkpr	Description	Hours	Amount
07/31/24	JWW	Emails regarding FSS sale issues and Cicak APA (.3); phone conference with E. Jones and C. Murray regarding open issues in case (1.1); conference with Tranzon regarding sale process (.8); emails regarding discussion with TX plaintiffs (.2); conference regarding same (.3); conference with TX plaintiffs' counsel and Trustee regarding potential resolution (1.1).	3.80	3,591.00
Total Services			161.10	\$108,569.50

Timekeeper Summary

<u>Attorney/Legal Assistant</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
AKN Adam K. Nalley	Partner	6.50	900.00	5,850.00
CMM Christine M. McMillan	Partner	2.60	785.00	2,041.00
JTL Jason T. Lloyd	Partner	0.90	900.00	810.00
JWW Joshua W. Wolfshohl	Partner	29.70	945.00	28,066.50
SJR Sarah J. Ring	Partner	1.00	925.00	925.00
JTS Jordan T. Stevens	Associate	12.40	595.00	7,378.00
KLS Kenesha L. Starling	Associate	46.30	575.00	26,622.50
MBD Michael B. Dearman	Associate	53.00	625.00	33,125.00
EG Eliana Garfias	Paralegal	4.90	405.00	1,984.50
MLW Mitzie L. Webb	Paralegal	3.80	465.00	1,767.00

Disbursements Summary

Description	Value
Computer Assisted Legal Research	1,927.14
Filing Fees	2.45
Reproduction	0.45
Total Disbursements	\$1,930.04

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Invoice Total

\$110,499.54

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 7
ALEXANDER E. JONES,	§	
	§	Case No. 22-33553 (CML)
Debtor.	§	
	§	

**THIRD MONTHLY FEE STATEMENT OF PORTER HEDGES LLP, AS
BANKRUPTCY COUNSEL FOR CHAPTER 7 TRUSTEE, CHRISTOPHER R.
MURRAY, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES FOR THE PERIOD FROM AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

Name of Applicant:	Porter Hedges LLP, as proposed Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray
Date of Retention Order:	July 30, 2024 (Doc. No. 792) ¹
Period for which Fees and Expenses are Incurred:	August 1, 2024 through and including August 31, 2024
Interim Fees Incurred:	\$103,537.50
Interim Payment of Fees Requested (80%):	\$82,830.00
Interim Expenses Incurred:	\$1,881.17
Total Fees and Expenses Due:	\$84,711.17

This is the Third Monthly Fee Statement.

¹ The Trustee's application to employ Porter Hedges was filed at Docket No. 756.

Porter Hedges LLP (“Porter Hedges”), as Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray (the “Trustee”), submits this Third Monthly Fee Statement (the “Fee Statement”) for the period from August 1, 2024 through August 31, 2024 (the “Application Period”) in accordance with the proposed *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Trustee* [Docket No. 793] (the “Interim Compensation Order”).

Porter Hedges requests compensation for professional services rendered in the amount of \$103,537.50 (the “Fees”), and for reimbursement of out-of-pocket expenses incurred in the amount of \$1,881.17 (the “Expenses”), for the period from August 1, 2024 through August 31, 2024. Eighty percent (80%) of the fees equals \$82,830.00 and one hundred percent (100%) of the Expenses equals \$1,881.17 for a total requested amount of \$84,711.17.

Summaries of the calculations for these fees by project category and expenses are attached hereto as **Exhibit 1** and **Exhibit 2**, respectively. A summary of the time expended by Porter Hedges attorneys and support staff, together with their respective hourly rates, is attached hereto as **Exhibit 3**. Porter Hedges’ invoice for the Application Period is attached hereto as **Exhibit 4**.

WHEREFORE, Porter Hedges respectfully requests payment and reimbursement in accordance with the procedures set forth in the proposed Interim Compensation Order (*i.e.*, payment of eighty percent (80%) of the compensation sought, in the amount of \$82,830.00 and reimbursement of one hundred percent (100%) of expenses incurred in the amount of \$1,881.17 in the total amount of \$84,711.17.

Dated: September 9, 2024
Houston, Texas

Respectfully Submitted,

By: /s/ Joshua W. Wolfshohl

PORTER HEDGES LLP

Joshua W. Wolfshohl (TX Bar No. 24038592)

1000 Main St., 36th Floor

Houston, Texas 77002

Telephone: (713) 226-6000

Facsimile: (713) 226-6248

jwolfshohl@porterhedges.com

***Counsel for the Chapter 7 Trustee,
Christopher R. Murray***

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on September 9, 2024.

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl

EXHIBIT 1

SUMMARY OF TIME EXPENDED BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees Requested
Asset Analysis/Recovery	113.90	78,584.00
Case Administration	16.80	7,525.50
Employment/Fee Application	14.30	8,932.50
Litigation/Contested Matters	15.10	8,495.50
TOTAL	160.10	103,537.50

EXHIBIT 2

SUMMARY OF OUT-OF-POCKET EXPENSES

Expenses	Cost
Computer Assisted Legal Research	374.18
Delivery Service	48.00
Postage	0.97
Reproduction	1.95
Reproduction Services	1,427.72
Service Fee	28.35
TOTAL	1,881.17

EXHIBIT 3

SUMMARY OF TIME EXPENDED BY ATTORNEYS AND SUPPORT STAFF

Professional	Hourly Rate	Total Hours
Derek V. Forinash	\$950.00	3.50
Joshua W. Wolfshohl	\$945.00	26.70
Michael B. Dearman	\$625.00	54.20
Jordan T. Stevens	\$595.00	1.50
Kenesha L. Starling	\$575.00	55.80
Carey A. Sakert	\$470.00	6.70
Mitzie L. Webb	\$465.00	4.60
Eliana Garfias	\$405.00	4.60
Pamela A. Balser	\$410.00	.50
Allyson A. Adame	\$385.00	2.00
TOTAL		160.10

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ATTN: CHRIS MURRAY

TAX ID# 74-2174193

Alex Jones

Invoice Summary

Professional Services	\$103,537.50
Disbursements	1,881.17
	<hr/>
Total Current Invoice	\$105,418.67
 TOTAL AMOUNT DUE	 <u><u>\$105,418.67</u></u>

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For professional services rendered and related expenses incurred in the above-referenced matter through August 2024, as follows:

Date	Tkpr	Description	Hours	Amount
08/01/24	MBD	Correspond with J. Chiba regarding case administration (.1); conference with PH team and Trustee team regarding case strategy and outstanding issues (1.2); conference with K. Starling regarding application to employ Tranzon (.2); begin draft application to employ Tranzon (.3); multiple correspondence with counterparties to agreed stipulation and confidentiality agreement (.5); continue draft motion to sell FSS assets (2.9); correspond with M. Kingston regarding protective order (.3); multiple correspondence with Texas counsel regarding protective order (.2).	5.70	3,562.50
08/01/24	KLS	Teams call with M. Dearman regarding application to employ Tranzon.	0.30	172.50
08/01/24	JWW	Work on issues related to subpoena responses and discovery (.3); emails regarding sale issues (.2); conference with trustee and team regarding sale issues and related open issues in case (1.2); conference with trustee and A. Jones (.6); follow-up call with trustee and E. Jones (.4).	2.70	2,551.50
08/02/24	MBD	Correspond with U.S. Trustee regarding protective order (.2); prepare protective order for filing (.5); continue draft sale motion and order (.9); calendar fee application deadlines (.2); numerous correspondence and conferences with objecting parties regarding protective order (1.5); conference with C. Murray regarding document production and sale motion (.2); correspond with C. Murray, J. Wolfshohl, and E. Jones regarding same (.2).	3.70	2,312.50
08/02/24	JTS	Review and analyze the Protective Order governing the earlier production of documents.	0.30	178.50

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Date	Tkpr	Description	Hours	Amount
08/02/24	EG	Correspondence on draft and filing logistics of protective order (.1); receive, review, and electronically file same with court (.2); download and circulate filed version (.1); email case manager on submission of same (.1); update file (.1).	0.60	243.00
08/02/24	MLW	Email exchanges with M. Dearman regarding proposed Confidentiality Agreement and Protective Order (.2); receive and file same with copy to Court Case Manager (.3).	0.50	232.50
08/05/24	MBD	Conference with D. Forinash and J. Wolfshohl regarding IP issues (.2); conference with J. Wolfshohl regarding case status (.2); multiple correspondence with C. Murray regarding fee application objections (.1); conference with Trustee team and J. Wolfshohl regarding professional fee applications (.8); continue draft bid procedures and sale motion (2.2).	3.50	2,187.50
08/05/24	DVF	Discussing intellectual property issues with M. Dearman and J. Wolfshohl.	0.50	475.00
08/05/24	JWW	Conference with M. Dearman regarding structure of asset sale and related issues (.5); review fee application summary in preparation for meeting with Trustee team (.3); conference with Trustee team regarding strategy for fee application review and negotiation (1.1); conference with L. Freeman regarding same (.3); conference with E. Jones regarding same (.8); follow-up emails on subpoena (.1).	3.10	2,929.50
08/06/24	MBD	Conference with K. Starling regarding Tranzon retention application (.2); continue draft bid procedures motion, bid procedures, and bid procedures order (3.7); attend to correspondence with PH team regarding motion to remand (.2); correspond with C. Murray regarding IP assets (.1).	4.20	2,625.00
08/06/24	KLS	Begin initial draft of Trustee's Application to Employ Tranzon360 as Sale Broker.	6.70	3,852.50

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Date	Tkpr	Description	Hours	Amount
08/06/24	JTS	Review and analyze the draft complaints provided by Akin Gump.	0.40	238.00
08/06/24	CAS	Communications with K. Starling, J. Wolfshohl, and vendor regarding setting up new database (.5); communications with A. Adame to coordinate setting up new ShareFile site and collecting and transferring client data to vendor for processing (.3).	0.80	376.00
08/06/24	JWW	Emails and phone conferences regarding fee application resolution options and related issues (.6); emails regarding IP sale issues (.1); emails regarding protective order entry and issues with data obtained by subpoena (.3); work on fee statement (.5).	1.50	1,417.50
08/07/24	MBD	Review and revise retention application for Tanzon (.5); correspond with K. Starling regarding same (.2); continue draft bid procedures and order (.6).	1.30	812.50
08/07/24	KLS	Continue initial draft of Trustee's Application to Employ Tranzon360 as Sale Broker and declaration of K. Toney in support of same.	2.70	1,552.50
08/07/24	AAA	Download .zip files from Akin Gump to L: drive (.4); upload .zip files to ShareFile (.5); prepare FTP link to circulate to vendor for processing (1.1).	2.00	770.00
08/07/24	CAS	Communications with A. Adame regarding contacting Akin Gump for direct access to client data (.2); communications with K. Starling and J. Wolfshohl regarding options for e-discovery platform (.5); contact Will Dent at Innovative Driven regarding setting up new database (.3); work with A. Adame to transfer hundreds of GBs to Innovative Driven (.6).	1.60	752.00

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Date	Tkpr	Description	Hours	Amount
08/08/24	MBD	Review and revise Toney declaration (.2); continue draft and revise auction and sale motion (1.8); conference with Trustee team and PH team regarding case status and strategy (.8); correspond with K. Starling and J. Stevens regarding discovery issues and litigation (.2).	3.00	1,875.00
08/08/24	KLS	Weekly Teams call (.5); begin Trustee's Motions for extension of time to respond to Plaintiffs' Motions to Remand and proposed orders regarding same (1.3); begin review of draft Complaints (.5).	2.30	1,322.50
08/08/24	JTS	Prepare for and attend a strategy session with members of the Porter Hedges Team and the Client Team (.6); correspond with members of the Porter Hedges Team regarding points raised therein (.2).	0.80	476.00
08/08/24	CAS	Continue transferring data from Akin Gump to vendor for processing and loading (.7); communications with vendor regarding details of client data (.3); provide K. Starling with updates on status of database (.6).	1.60	752.00
08/08/24	JWW	Emails regarding issues related to remand response (.3); emails regarding storage of subpoena response material (.1); weekly call with Trustee team regarding open issues (.8); conference with W. Cicak regarding status of APA (.3); phone conference with J. Martin regarding extension to response deadline (.2); conference with C. Murray and E. Jones regarding sale strategy for FSS (.7); follow-up emails regarding same (.1); review fee statement and circulate to Trustee (.2).	2.70	2,551.50
08/09/24	MBD	Correspond with Committee, PH team, and Trustee team regarding documents requests.	0.20	125.00

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Date	Tkpr	Description	Hours	Amount
08/09/24	KLS	Finalize Trustee's Motions for Extension of Time to respond to Plaintiffs' Motions to Remand and proposed orders regarding same.	1.70	977.50
08/09/24	EG	Correspondence on potential filing (.2); monitor emails for status of same (1.0); receive, review, and electronically file same with court (.6); download and circulate same (.2); update file (.1).	2.10	850.50
08/09/24	CAS	Continue coordinating data transfer to vendor ID (.4); communications with vendor regarding status of project (.3).	0.70	329.00
08/11/24	MBD	Draft nondisclosure agreement (.8); correspond with J. Wolfshohl regarding same (.1).	0.90	562.50
08/12/24	MBD	Multiple correspondence with C. Murray regarding nondisclosure agreement (.2); continue revising sale motion and order (5.2); correspond with V. Driver regarding nondisclosure agreement (.2); conference with Tranzon, C. Murray, J. Wolfshohl regarding sale (1.0).	6.60	4,125.00
08/12/24	KLS	Draft amended certificate of service for Joint Motions for Extensions of Time to Respond to Plaintiffs' Motions to Remand.	1.50	862.50
08/12/24	EG	Correspondence on submission of certificate of service (.2); receive, review and electronically file same with court (.2); upload same (.1); follow up emails on same (.1); discuss same with M. Webb (.1).	0.70	283.50
08/12/24	CAS	Email communications with vendor regarding setting up M. Dearman and J. Stevens with access to database (.2); confer with vendor regarding organization of client data (.4).	0.60	282.00

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Date	Tkpr	Description	Hours	Amount
08/12/24	MLW	Email exchanges and calls with K. Starling regarding Amended Certificate of Service (.2); review draft and provide proposed edits to same (1.3); confer with E. Garfias regarding filing Amended Certificate (.2).	1.70	790.50
08/12/24	JWW	Emails regarding sale issues (.2); review emails from W. Cicak (.1); conference with Tranzon regarding sale process (.9); emails regarding same (.1); work on fee statement finalization and filing (.2); emails regarding issues with removed actions and review emails from court (.3); emails regarding subpoena issues and memos from UCC (.2); emails regarding Bloomberg inquiry (.1).	2.10	1,984.50
08/13/24	MBD	Correspond with J. Wolfshohl regarding sale motion (.1); correspond with K. Starling regarding Tranzon360 employment application (.1); review and revise sale motion (.4); correspond with C. Murray and E. Jones regarding same (.1).	0.70	437.50
08/13/24	KLS	Begin review and analysis of UCC draft complaints.	2.40	1,380.00
08/13/24	JWW	Review motion to sell and provide comments to same (.5); several emails regarding sale process and email to M. Cuban regarding sale issues (.4); emails regarding issues related to fee applications and review docket regarding same (.2).	1.10	1,039.50
08/14/24	MBD	Revise Tranzon employment application (.8); attend to multiple correspondence regarding discovery (.3); multiple correspondence Tranzon employment application (.2); continue revising sale motion and order (.5).	1.80	1,125.00
08/14/24	KLS	Further revise Trustee's Application to Employ Tranzon360 and declarations in support of same (2.4); complete review and analysis of UCC draft complaints (3.2).	5.60	3,220.00

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Date	Tkpr	Description	Hours	Amount
08/14/24	EG	Correspondence on filings logistics of joint motion for extension of time (.2); receive, review, and electronically file same with court (.2); download and circulate same (.1); coordinate service (.1); update file (.1).	0.70	283.50
08/14/24	CAS	Communications with K. Starling regarding setting up complex searches to facilitate her review.	0.30	141.00
08/14/24	JWW	Emails and conference regarding sale motion and next steps for FSS assets (.6); conference with J. Martin regarding abatement of claim objection and review same (.3); emails regarding filing same (.1); emails regarding Tranzon employment and structure of application (.2); emails regarding sale process (.1).	1.30	1,228.50
08/15/24	MBD	Draft alternate sale order language (.7); review docket updates (.2); conference with Trustee team and PH team regarding case status and strategy (.5); correspond with C. Murray, E. Jones, and J. Wolfshohl regarding sale order language (.1); conference with J. Wolfshohl regarding same (.1); conference with C. Murray regarding same (.1); multiple correspondence with J. Wolfshohl and K. Starling regarding claims analysis (.3); revise Tranzon360 declarations and correspond with J. Wolfshohl and K. Starling regarding same (.5); continue revising sale motion and order (2.2); correspond with C. Murray and E. Jones regarding same (.1).	4.80	3,000.00
08/15/24	KLS	Finalize declarations in support of Trustee's Application to Employ Tranzon360 (.2); weekly call via Teams (.2); begin analysis of PQPR claims for Trustee (5.1).	5.50	3,162.50

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Date	Tkpr	Description	Hours	Amount
08/15/24	JWW	Emails regarding sale process and Tranzon retention (.3); weekly conference call with Trustee team regarding all open issues in cases (.5); review and revise Tranzon retention and several emails with PH team regarding finalizing same for filing (.9); emails with M. Dearman regarding revisions to motion to approve sale process (.3); work on issues related to PQPR and analysis of claims (.5).	2.50	2,362.50
08/16/24	MBD	Conference with J. Tannenbaum regarding auction procedures (.3); multiple correspondence with E. Garfias and J. Wolfshohl regarding sale motion and filing logistics (.2); correspond with K. Starling, Tranzon, and ThreeSixty regarding employment applications (.2); review and revise sale motion and order (1.0).	1.70	1,062.50
08/16/24	KLS	Continue analysis of PQPR claims for Trustee.	2.50	1,437.50
08/16/24	EG	Correspondence on draft and revisions to sale motion.	0.20	81.00
08/16/24	JWW	Emails regarding analysis of fee requests (.2); work on sale procedure and circulate revisions to Tranzon and sale motion and follow-up emails regarding same (.9); emails regarding discussion with CT plaintiffs (.1).	1.20	1,134.00
08/17/24	MBD	Review J. Tannenbaum revisions to sale order (.3); revise sale order (1.7).	2.00	1,250.00
08/18/24	MBD	Revise sale motion and incorporate changes (.4); correspond with C. Murray, E. Jones, and J. Wolfshohl regarding sale motion (.1).	0.50	312.50

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Date	Tkpr	Description	Hours	Amount
08/19/24	MBD	Conference with C. Murray, E. Jones, and J. Wolfshohl regarding auction procedures (.5); continue revising sale motion and order (2.2); conference with counsel to Connecticut plaintiffs, C. Murray, E. Jones, and J. Wolfshohl regarding case status (.3); conference with J. Tannenbaum regarding revisions to sale order (.3).	3.30	2,062.50
08/19/24	KLS	Continue analysis of potential PQPR claims.	5.50	3,162.50
08/19/24	DVF	Drafting list of disclosure requests for unregistered intellectual property.	2.00	1,900.00
08/19/24	JWW	Several emails regarding revisions to sale motion and Tranzon application and related strategy issues (.7); conference call regarding same (.5); conference call with Paul Weiss regarding open issues in case (.5); follow-up emails with Tranzon regarding sale issues (.3).	2.00	1,890.00
08/20/24	MBD	Conference with J. Wolfshohl regarding sale order (.1); revise sale motion and order (.2); correspond with D. Forinash regarding trademarks (.1); correspond with C. Murray regarding same (.1).	0.50	312.50
08/20/24	DVF	Discussing trademark search requirements with P. Balser, finalizing list of disclosure requests for unregistered intellectual property.	0.50	475.00
08/21/24	MBD	Review and revise sale motion and order and prepare for filing (3.6); attend to correspondence with C. Murray regarding intellectual property and sale motion (.3); correspond with E. Garfias and M. Webb regarding sale motion and employment application (.1).	4.00	2,500.00
08/21/24	MLW	Email exchanges with M. Dearman regarding sale motion (.2); confer with Court Case Manager regarding availability for hearing (.2); update M. Dearman regarding same (.2).	0.60	279.00

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Date	Tkpr	Description	Hours	Amount
08/21/24	JWW	Work on sale issues and emails with M. Dearman regarding same.	0.50	472.50
08/21/24	PAB	Prepare correspondence and send to associate requesting comprehensive trademark ownership search for two entities (.4); report same to requesting attorney (.1).	0.50	207.50
08/22/24	MBD	Conference with C. Murray regarding hearing logistics (.1); conference and correspond with M. Webb regarding sale motion (.2); conference with M. Webb regarding filing and service logistics (.2); multiple correspondence with Tranzon and ThreeSixty regarding sale motion and retention application (.1); correspond with H. Nguyen regarding sale motion (.1).	0.70	437.50
08/22/24	MLW	Confer with M. Dearman regarding obtaining court's availability for hearing on sale motion (.2); confer with Court Case Manager and update M. Dearman (.2); finalize sale motion and file (.8); coordinate service of same (.1); forward copy of filed sale motion to Court Case Manager (.1).	1.40	651.00
08/22/24	DVF	Reviewing results of trademark search.	0.50	475.00
08/22/24	JWW	Phone conference with J. Martin regarding FSS sale (.2); emails regarding finalizing sale motion and Tranzon application and conference with M. Dearman and K. Starling regarding same (.5); emails with K. Kempler regarding same (.1); emails with prospective buyer (.1); emails with Trustee regarding same and other issues (.1); review docket (.1).	1.10	1,039.50
08/23/24	MLW	Email exchange with M. Dearman confirming mail-out of Sale Motion.	0.10	46.50

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Date	Tkpr	Description	Hours	Amount
08/26/24	MBD	Correspond with interested party and trustee regarding auction and sale (.1); compile documents related to same (.1); correspond with K. Starling regarding claims analysis (.1); multiple correspondence with C. Murray, E. Jones, and J. Wolfshohl regarding real property (.2); attend to auction preparation materials (.1); review confidentiality agreement (.2); correspond with C. Murray regarding same (.1); correspond with Tranzon360 regarding property sales (.1).	1.00	625.00
08/26/24	KLS	Continue review and analysis of documents produced in response to UCC subpoena regarding PQPR claims for Trustee.	2.50	1,437.50
08/27/24	MBD	Conference with interested party, C. Murray, E. Jones, and J. Wolfshohl regarding asset sales (.3); conference with C. Murray and E. Jones regarding same (.3); correspond with J. Tannenbaum regarding intellectual property (.1); review sale information request list (.2).	0.90	562.50
08/27/24	KLS	Continue review and analysis of documents produced in response to UCC subpoena regarding PQPR claims for Trustee.	6.50	3,737.50
08/27/24	JWW	Emails regarding questions from prospective bidders (.3); conference with potential bidder (.5); emails and conference with M. Dearman regarding same (.5).	1.30	1,228.50
08/28/24	MBD	Correspond with C. Murray regarding interested parties (.1); conference with Tranzon360 team, C. Murray, E. Jones, and J. Wolfshohl regarding auction (.9); multiple correspondence with J. Tannenbaum regarding intellectual property (.2); prepare NDA for Tranzon360 (.1); review and prepare list of additional intellectual property items (.1).	1.40	875.00

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08/28/24	KLS	Continue review and analysis of documents produced in response to UCC subpoena regarding PQPR claims for Trustee.	2.20	1,265.00
08/28/24	CAS	Export and create review set of hot documents for K. Starling (.8); communications with vendor regarding protocols and procedures (.3).	1.10	517.00
08/28/24	MLW	Confer with Court Case Manager and J. Wolfshohl regarding time estimate for Sale Motion hearing.	0.30	139.50
08/28/24	JWW	Several emails regarding sale issues (.2); conference with Tranzon regarding same (.9); follow-up emails regarding same (.3).	1.40	1,323.00
08/29/24	MBD	Review document production (.2); conference with C. Murray, E. Jones, J. Wolfshohl and J. Stevens regarding case status and strategy (.5); conference with J. Stevens regarding case strategy and lien analysis (.4); multiple correspondence with K. Starling regarding same (.2); conference with J. Martin and J. Wolfshohl regarding case status and sale (.3); correspond with C. Murray and E. Jones regarding case status (.1); conference with J. Wolfshohl regarding upcoming hearing (.1).	1.80	1,125.00
08/29/24	KLS	Continue initial drafts of Trustee's Motions to Transfer Venue.	4.40	2,530.00
08/29/24	EG	Correspondence on case docket and adversaries (.1); update case calendar (.2).	0.30	121.50
08/29/24	JWW	Weekly call with Trustee team regarding sale issues and other open matters in case (.6); follow-up with PH team regarding workstreams (.2); conference with J. Martin regarding auction process and position of Texas plaintiffs (.2); follow-up emails regarding same (.2); review docket regarding PQPR hearing and emails regarding same (.3).	1.50	1,417.50

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Date	Tkpr	Description	Hours	Amount
08/30/24	KLS	Finalize initial drafts of Trustee's Motions to Transfer Venue.	3.50	2,012.50
08/30/24	JWW	Emails regarding extension of exemption objection deadline (.1); emails regarding sale process and issues with plaintiffs (.2); conference with E. Jones regarding sale issues (.4).	0.70	661.50
Total Services			160.10	\$103,537.50

Timekeeper Summary

<u>Attorney/Legal Assistant</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
DVF Derek V. Forinash	Partner	3.50	950.00	3,325.00
JWW Joshua W. Wolfshohl	Partner	26.70	945.00	25,231.50
JTS Jordan T. Stevens	Associate	1.50	595.00	892.50
KLS Kenesha L. Starling	Associate	55.80	575.00	32,085.00
MBD Michael B. Dearman	Associate	54.20	625.00	33,875.00
PAB Pamela A. Balser	Technical Advisor	0.50	415.00	207.50
AAA Allyson A. Adame	Paralegal	2.00	385.00	770.00
CAS Carey A. Sakert	Paralegal	6.70	470.00	3,149.00
EG Eliana Garfias	Paralegal	4.60	405.00	1,863.00
MLW Mitzie L. Webb	Paralegal	4.60	465.00	2,139.00

Disbursements Summary

Description	Value
Computer Assisted Legal Research	374.18
Delivery Service	48.00
Postage	0.97
Reproduction	1.95
Reproduction Services	1,427.72
Service Fee	28.35
Total Disbursements	\$1,881.17

PORTER HEDGES LLP

A REGISTERED LIMITED LIABILITY PARTNERSHIP

DEPT. 510
P.O. BOX 4346
HOUSTON, TEXAS 77210-4346

TELEPHONE (713) 226-6000
TELECOPIER (713) 228-1331

Page 15
Inv# 567594
Date 09/06/24
018577-0001
JOSHUA W. WOLFSTOHL

TAX ID# 74-2174193

Invoice Total

\$105,418.67

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: ALEXANDER E. JONES, <div style="text-align: center;">Debtor.</div>	§ § § § § §	Chapter 7 Case No. 22-33553 (CML)
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**FOURTH MONTHLY FEE STATEMENT OF PORTER HEDGES LLP, AS BANKRUPTCY
COUNSEL FOR CHAPTER 7 TRUSTEE, CHRISTOPHER R. MURRAY, FOR ALLOWANCE
OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

Name of Applicant:	Porter Hedges LLP, as proposed Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray
Date of Retention Order:	July 30, 2024 (Doc. No. 792) ¹
Period for which Fees and Expenses are Incurred:	September 1, 2024 through and including September 30, 2024
Interim Fees Incurred:	\$130,496.00
Interim Payment of Fees Requested (80%):	\$104,396.80
Interim Expenses Incurred:	\$4,836.49
Total Fees and Expenses Due:	\$109,233.29

This is the Fourth Monthly Fee Statement.

¹ The Trustee's application to employ Porter Hedges was filed at Docket No. 756.

Porter Hedges LLP (“Porter Hedges”), as Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray (the “Trustee”), submits this Fourth Monthly Fee Statement (the “Fee Statement”) for the period from September 1, 2024 through September 30, 2024 (the “Application Period”) in accordance with the proposed *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Trustee* [Docket No. 793] (the “Interim Compensation Order”).

Porter Hedges requests compensation for professional services rendered in the amount of \$130,496.00 (the “Fees”), and for reimbursement of out-of-pocket expenses incurred in the amount of \$4,836.49 (the “Expenses”), for the period from September 1, 2024 through September 30, 2024. Eighty percent (80%) of the fees equals \$104,396.80 and one hundred percent (100%) of the Expenses equals \$4,836.49 for a total requested amount of \$109,233.29.

Summaries of the calculations for these fees by project category and expenses are attached hereto as **Exhibit 1** and **Exhibit 2**, respectively. A summary of the time expended by Porter Hedges attorneys and support staff, together with their respective hourly rates, is attached hereto as **Exhibit 3**. Porter Hedges’ invoice for the Application Period is attached hereto as **Exhibit 4**.

WHEREFORE, Porter Hedges respectfully requests payment and reimbursement in accordance with the procedures set forth in the proposed Interim Compensation Order (*i.e.*, payment of eighty percent (80%) of the compensation sought, in the amount of \$104,396.80 and reimbursement of one hundred percent (100%) of expenses incurred in the amount of \$4,836.49 in the total amount of \$109,233.29.

Dated: October 18, 2024
Houston, Texas

Respectfully Submitted,

By: /s/ Joshua W. Wolfshohl

PORTER HEDGES LLP

Joshua W. Wolfshohl (TX Bar No. 24038592)

1000 Main St., 36th Floor

Houston, Texas 77002

Telephone: (713) 226-6000

Facsimile: (713) 226-6248

jwolfshohl@porterhedges.com

Counsel for the Chapter 7 Trustee,

Christopher R. Murray

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on October 18, 2024.

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl

EXHIBIT 1

SUMMARY OF TIME EXPENDED BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees Requested
Asset Analysis/Recovery	146.00	96,744.50
Case Administration	15.30	6,358.50
Employment/Fee Application	.90	850.50
Litigation/Contested Matters	40.30	26,542.50
TOTAL	202.50	130,496.00

EXHIBIT 2

SUMMARY OF OUT-OF-POCKET EXPENSES

Expenses	Cost
Computer Assisted Legal Research	2,291.91
Delivery Service	48.00
Foreign Associate Fees	1,471.08
Reproduction Services	1,025.50
TOTAL	4,836.49

EXHIBIT 3

SUMMARY OF TIME EXPENDED BY ATTORNEYS AND SUPPORT STAFF

Professional	Hourly Rate	Total Hours
Joshua W. Wolfshohl	\$945.00	36.20
Adam K. Nalley	\$900.00	.30
Michael B. Dearman	\$625.00	52.30
Jordan T. Stevens	\$595.00	40.00
Kenesha L. Starling	\$575.00	53.20
Grecia V. Sarda	\$500.00	5.00
Mitzie L. Webb	\$465.00	2.70
Eliana Garfias	\$405.00	12.80
TOTAL		202.50

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HOUSTON, TEXAS 77210-4346

TELEPHONE (713) 226-6000
TELECOPIER (713) 228-1331

ATTN: CHRIS MURRAY

Invoice Date: October 17, 2024
Invoice Num.: 569275
Matter Number: 018577-0001
Billing Attorney: Joshua W. Wolfshohl
Tax ID: #74-2174193

Matter: Alex Jones

For professional services rendered and costs incurred through September 30, 2024

Professional Services	130,496.00
Disbursements	4,836.49
Total Amount Due	\$135,332.49

PORTER HEDGES LLP

Client: CHRIS MURRAY, CHAPTER 7 TRUSTEE
 Matter: Alex Jones

Invoice Date: October 17, 2024
 Invoice Num.: 569275
 Matter Number: 018577-0001

Time Detail

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/02/2024	MBD	Begin draft sale motion (.8); correspond with C. Murray regarding same (.1).	0.90	562.50
09/03/2024	JWW	Review motion to transfer venue in Western District case and emails with K. Starling regarding same.	0.50	472.50
09/03/2024	MBD	Continue draft motion to sell.	0.10	62.50
09/04/2024	MBD	Review interim compensation procedures (.2); multiple correspondence with V. Driver regarding intellectual property (.2); correspond with D. Forinash regarding trademarks (.1); continue draft motion to sell intellectual property (.2); draft motion and order to sell real property and employ Keller Williams (2.2); draft declaration ISO same (.3); correspond with C. Murray and E. Jones regarding motion to sell real property (.1); review trademark reports and correspond with J. Tannenbaum and C. Murray regarding same (.2).	3.50	2,187.50
09/05/2024	MBD	Continue draft sale motion (1.0); conference with J. Tannenbaum, K. Toney, C. Murray, and E. Jones regarding sale process (.8); conference with Trustee team and PH team regarding case strategy (1.0); revise motion to sell real property (1.0); review NDA and correspond with C. Murray regarding same (.2); correspond with M. Webb regarding upcoming hearings (.1); correspond with B. Schleizer regarding assets (.1); correspond with J. Tanenbaum regarding auction (.2); update PH team regarding case status (.3).	4.70	2,937.50
09/05/2024	JWW	Emails regarding open issues and status conference setting.	0.40	378.00
09/05/2024	MLW	Confer with Court Case Manager regarding Court's request for a status conference (.2); confer with J. Wolfshohl regarding same (.2).	0.40	186.00
09/05/2024	JTS	Prepare for and attend a strategy session with the Porter Hedges Team and the Trustee Team.	0.40	238.00

PORTER HEDGES LLP

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/06/2024	MBD	Correspond with J. Tannenbaum and C. Murray regarding NDAs (.1); attend to correspondence with B. Schleizer regarding intellectual property (.1); conference with K. Starling regarding pending motions and case strategy (.4).	0.60	375.00
09/06/2024	JWW	Attend PQPR hearing (.2); work on fee statement (.5); emails regarding open issues with sale (.2).	0.90	850.50
09/06/2024	KLS	Teams call with M. Dearman regarding tasks concerning A. Jones and Free Speech Systems, including Motions to Transfer Venue and Sales Motion.	0.50	287.50
09/09/2024	MBD	Conference with J. Tannenbaum and IT professionals regarding IP auction (.4); conference with J. Tannenbaum regarding legal issues related to IP assets (.5); conference with J. Stevens regarding lien avoidance issues (.2); analyze book and video game agreements (.2).	1.30	812.50
09/09/2024	JWW	Conference with C. Murray and K. Starling regarding motion to transfer venue and related issues (.3); follow-up with K. Starling and emails regarding sale motion and related issues (.5).	0.80	756.00
09/09/2024	KLS	Teams call with J. Wolfshohl and C. Murray regarding Motions to Transfer Venue and Response to Motions to Remand (.2); further revise Motions to Transfer Venue (1.1); review Plaintiff's Motions to Remand (.5); memo regarding analysis of PQPR claims (2.1).	3.90	2,242.50
09/09/2024	EG	Correspondence on filing logistics of motions to transfer venue.	0.20	81.00
09/09/2024	JTS	Conduct legal research and analysis regarding potential fraudulent transfer claims in connection with PQPR's liens.	1.40	833.00
09/10/2024	JWW	Prepare for status conference and review docket regarding same (.9); conference with K. Starling regarding motion to transfer venue and response to motion to remand (.4); follow-up regarding same (.2);	3.40	3,213.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		review revisions to motion to transfer venue and further revise same (1.0); emails with C. Murray and K. Starling regarding same (.1); review issues related to sale and IP and conference and emails with M. Dearman regarding same (.8).		
09/10/2024	MBD	Continue reviewing book agreement and video game agreement (1.0); continue draft motion to sell (1.8); correspond with J. Wolfshohl regarding same (.2); correspond with C. Murray regarding same (.1); analyze case law governing rejection (1.0); conference with J. Wolfshohl regarding sale issues (.4).	4.50	2,812.50
09/10/2024	KLS	Teams call with J. Wolfshohl regarding Trustee's Response to Texas Plaintiffs' Motions to Remand (.2); further revise Trustee's Motions to Transfer Venue and begin initial draft of Trustee's Response to Texas Plaintiffs' Motions to Remand (7.3).	7.50	4,312.50
09/10/2024	JTS	Conduct legal research and analysis regarding potential fraudulent transfer claims in connection with PQPR's liens.	8.00	4,760.00
09/11/2024	JWW	Prepare for status hearing, review wind down motion, docket and adversary opinion (.5); meet with Trustee and E. Jones in preparation for hearing (.5); attend hearing regarding case status (.5); meet with A. Catmull and Trustee team regarding open issues with FSS (.4); emails and phone conference with J. Martin (.2); emails and phone conference with K. Starling regarding Western District case, transfer and response to remand motion (.3).	2.40	2,268.00
09/11/2024	MBD	Numerous correspondence with K. Starling and J. Stevens regarding PQPR (.5); conference with K. Toney regarding real property sales (.2); continue draft Jones IP sale motion (2.8); conference with interested purchaser and C. Murray (.5); respond to written inquiries from interested purchaser (.5); attend to correspondence with C. Murray, E. Jones, and J. Wolfshohl regarding hearing	4.70	2,937.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		(.2).		
09/11/2024	KLS	Draft memo to Trustee regarding PQPR debt.	9.50	5,462.50
09/11/2024	JTS	Continue conducting legal research and analysis regarding potential fraudulent transfer claims in connection with PQPR's liens and other potentially avoidable transfers (2.1); outline a memorandum to the Trustee summarizing the results of the same (.4); begin drafting a memorandum to the Trustee regarding potential fraudulent transfer claims .	2.50	1,487.50
09/12/2024	JWW	Emails regarding sale issues and issues regarding remand of Western District case (.3); weekly call with trustee team regarding open issues in case, upcoming mediation and hearing (.9); review PQPR memo and provide comments to same (.8); emails with PH team regarding same (.2); emails regarding PQPR informal mediation (.3); conference with J. Martin regarding extending deadline to respond to remand motion and review and revise same (.4).	2.90	2,740.50
09/12/2024	MBD	Revise memorandum on potential claims (1.0); correspond with K. Starling and J. Stevens regarding same (.1); correspond with J. Wolfshohl regarding same (.2); conference with Tranzon360 team and C. Murray regarding sale process (.6); conference with Trustee team and PH team regarding case strategy and updates (.7); draft witness and exhibit list for September 13 hearing (.5); review motion to sell (.1); correspond with J. Wolfshohl and E. Garfias regarding witness and exhibit list and sale motion (.3); respond to J. Tanenbaum inquiries regarding sale process (.3); begin revising sale order (.2).	4.00	2,500.00
09/12/2024	KLS	Weekly call with Trustee via Teams (.5); draft joint motions for extensions of time to respond to Texas Plaintiffs' Motions to Remand and finalize initial draft of Trustee's Response to Texas Plaintiffs' Motions to Remand (6.8).	7.30	4,197.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/12/2024	EG	Correspondence on draft and filing logistics of witness/exhibit list (.2); receive, review, and compile exhibits in support of same (.5); finalize and electronically file same with court (.2); download and circulate filed copy of same (.1); update file (.1); further emails on draft and filing logistics of motions for extension of time (.2); receive, review, and electronically file same with court (.3); download and circulate filed version (.1); update file (.1).	1.80	729.00
09/12/2024	JTS	Continue conducting legal research and analysis regarding potential fraudulent transfer claims to members of the Jones family, including reviewing relevant documents and agreements related to the same (1.9); continue drafting a memorandum to the Trustee regarding same (1.7).	3.60	2,142.00
09/13/2024	JWW	Prepare for hearing on sale of lake house (.8); attend hearing (.7); meet with Trustee and J. Martin regarding removed case (.4); participate in informal mediation with PQPR (2.5); meet with PH team regarding same (.2).	4.60	4,347.00
09/13/2024	KLS	Attend informal mediation with counsel to PQPR and Dr. and Mrs. David Jones (1.1); conference with J. Wolfshohl, J. Stevenson, and Trustee regarding information mediation (1.3); finalize and Joint Motions for Extension of Time and Trustee's Response to Plaintiffs' Motions to Remand (2.6).	5.00	2,875.00
09/13/2024	JTS	Prepare for an informal mediation between the Trustee and the Jones family, including by reviewing documents and conducting legal research, and attend the same.	4.60	2,737.00
09/15/2024	MBD	Continue draft IP sale motion.	1.00	625.00
09/16/2024	MBD	Continue draft IP assets sale motion (3.7); draft exhibit of contracts (1.5); conference with C. Murray regarding sale motion (.1); correspond with J. Tanenbaum and K. Toney regarding retention order (.1); correspond with K. Starling and J. Stevens regarding sale hearing (.2).	5.60	3,500.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/17/2024	MBD	Review UST objection to motion to winddown FSS (.1); correspond with PH team regarding same (.2); conference with K. Toney regarding hearing and asset sales (.2).	0.50	312.50
09/17/2024	JTS	Begin reviewing and analyzing the U.S. Trustee's Objection to the Trustee's Motion seeking authority to employ Tranzon and winddown FSS.	1.20	714.00
09/17/2024	EG	Review entered orders and docket deadlines.	0.20	81.00
09/18/2024	JWW	Emails and phone conferences regarding preparation for upcoming sale hearing, witness/exhibit list preparation, reply to UST objection and proffer (1.0); conference with Trustee and team regarding same and other open issues in case (1.5); follow-up regarding same and w/e list (.4); work on response to motion to remand (.8).	3.70	3,496.50
09/18/2024	MBD	Correspond with Trustee and PH team regarding sale motion (.1); attend to correspondence with Trustee team and PH team regarding case updates and UST objection (.2); conference with PH team regarding hearing preparations (.5); begin draft C. Murray proffer (.3); correspond with J. Stevens and K. Starling regarding reply to UST objection (.2).	1.30	812.50
09/18/2024	KLS	Teams call with J. Wolfshohl, J. Stevenson, and M. Dearman regarding September 24th hearing (.5); draft Witness and Exhibit List and begin preparing exhibits for September 24th hearing (2.1).	2.60	1,495.00
09/18/2024	JTS	Conduct legal research and evaluate counterarguments to U.S. Trustee's Objection to the Trustee's Motion seeking authority to employ Tranzon and winddown FSS (2.1); outline a draft of the Trustee's Reply to the same (.6); prepare for and attend a strategy session with J. Wolfshohl, E. Jones, and the Trustee regarding the U.S. Trustee's Objection (1.5); begin drafting the Trustee's Reply to the U.S. Trustee's Objection (1.2).	5.40	3,213.00
09/18/2024	MLW	Email exchanges with K. Starling regarding upcoming	0.10	46.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		filing of witness/exhibit list.		
09/19/2024	JWW	Conference with Tranzon regarding sale process (.5); weekly conference with Trustee team regarding sale issues and open matters in case (1.0); further conference with PH team regarding work streams (.4); work on response to motion to remand (1.3); emails regarding same and other open issues in case (.5).	3.70	3,496.50
09/19/2024	MBD	Conference with J. Wolfshohl, E. Jones, and J. Tanenbaum regarding sale process and hearing (.4); conference with Trustee team and PH team regarding hearing preparations and case status (1.0); draft motion for substantive consolidation (2.5); analyze case law regarding same (.5); conference with J. Wolfshohl and J. Stevens regarding same and reply to UST objection (.4); conference with K. Starling regarding motion and reply drafts (.2); conference with J. Tanenbaum regarding sale timeline (.2).	5.20	3,250.00
09/19/2024	KLS	Weekly status via Teams with the Trustee (1.0); finalize witness and exhibit list and preparation of exhibits for September 24th hearing (1.1); revise initial draft of Trustee's Response to Plaintiffs' Motion to Remand to incorporate comments and revisions from J. Wolfshohl (1.2).	3.30	1,897.50
09/19/2024	JTS	Prepare for and attend a strategy session with members of the Porter Hedges and Trustee Teams, including regarding the U.S. Trustee's Objection (.7); continue conducting legal research and analysis regarding the U.S. Trustee's Objection and the Trustee's Motion and Application, including as it regards the Trustee's authority and the Court's jurisdiction (7.1).	7.80	4,641.00
09/19/2024	EG	Correspondence on preparing and filing logistics of witness/exhibit list for September 24th hearing (.2); monitor emails for status of same of finalizing and filing of same (1.5); discuss same with M. Webb (.1); receive, review, and electronically file same with court (.8); download and circulate filed versions (.2); bookmark	3.40	1,377.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		and organize same for upcoming hearing (.5); update file (.1).		
09/19/2024	MLW	Email exchanges with K. Starling regarding witness/exhibit list; review/prepare exhibits for filing.	0.40	186.00
09/20/2024	MBD	Review limited objection from the Debtor (.2); correspond with PH team regarding motions and replies (.2); conference with Trustee team and PH team regarding case strategy (.5); correspond with E. Jones regarding winddown motion hearing preparations (.2).	1.10	687.50
09/20/2024	KLS	Teams call with Trustee regarding U.S. Trustee objections (.5); initial draft of Trustee's Motion to Substantially Consolidate (3.5).	4.00	2,300.00
09/20/2024	JWW	Emails regarding fee issues for FSS professionals (.2); emails regarding preparation of various filings (.3); review reply to UST objection (.3); conference with Trustee team regarding same (.5); review and revise response to remand motion (1.0); emails regarding same (.2); emails regarding various other filings (.1); conference with E. Jones regarding open issues (.3).	2.90	2,740.50
09/20/2024	JTS	Continue conducting legal research and revising the draft Reply to the U.S. Trustee's Objection, including in light of comments from the Porter Hedges and Trustee Teams.	2.00	1,190.00
09/20/2024	EG	Correspondence on potential filings of motion to transfer venue and response to motion to remand (.2); continuous monitoring of emails for status of same and filing logistics (.8).	1.00	405.00
09/22/2024	MBD	Draft notice of redline and redline winddown motion (.3); attend to correspondence with K. Starling and J. Stevens regarding motions and replies (.1); continue revising substantive consolidation motion (.5).	0.90	562.50
09/23/2024	JWW	Conference with C. Murray and E. Jones regarding sale hearing (.7); conference with M. Dearman regarding same (.3); review and revise reply to UST objection (.4);	1.90	1,795.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		draft proffer and emails with Trustee regarding same (.5).		
09/23/2024	MBD	Correspond with Trustee team regarding motions and replies (.1); conference with K. Starling regarding same (.2); review and incorporate revisions to proposed order (.2); conference with J. Wolfshohl regarding case strategy (.2); multiple correspondence with M. Webb and E. Garfias regarding filing (.3); review interim compensation order and correspond with J. Wolfshohl regarding fee application (.3); conference with J. Tanenbaum regarding hearing and sale order (.2).	1.50	937.50
09/23/2024	KLS	Further revise Trustee's Motions to Transfer Venue with respect to the turnover and garnishment actions (.5); continue analyzing the Debtor's trusts for the Trustee (1.0).	1.50	862.50
09/23/2024	JTS	Revise, edit and finalize the Trustee's Reply to the U.S. Trustee's Objection and prepare the same for filing.	1.20	714.00
09/23/2024	EG	Correspondence on draft and filing logistics of various filings (.2); continuous monitoring of emails for status of same (1.5); follow up emails on status of same (.3).	2.00	810.00
09/24/2024	MBD	Prepare revised winddown order, redline, and notice thereof (.7); multiple correspondence with E. Garfias and M. Webb regarding revised order (.2); correspond with J. Wolfshohl regarding sale order and supplement to dismissal order (.2); correspond with J. Stevens regarding hearing outcomes and next steps (.3); analyze sale order for necessary revisions (.3).	1.70	1,062.50
09/24/2024	JWW	Work on finalizing and filing order resolving limited objection (.2); prepare for hearing (2.2); meet with Trustee team and attend hearing on motion to sell (1.3); meet with UST and Trustee team and draft supplemental dismissal order (.7).	4.40	4,158.00
09/24/2024	JTS	Assist in preparing for the hearing on the Trustee's Motion seeking authority to employ Tranzon and to winddown FSS and virtually attend the same.	1.90	1,130.50

PORTER HEDGES LLP

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/24/2024	EG	Correspondence on notice of redline/revised proposed order (.1); receive, review, and discuss same with M. Dearman (.2); receive and electronically file revised notice of redline along with proposed order (.3); download and circulate filed version (.1); email case manager on submission of same (.1); coordinate service of same (.2); update file (.1).	1.10	445.50
09/25/2024	JWW	Emails and phone conference regarding sale issues in light of supplemental order (.4); emails with chapter 11 professionals regarding payment of fees (.2); emails regarding status of Western District case and pleadings to be filed (.2).	0.80	756.00
09/25/2024	MBD	Revise notice of sale (.4); analyze implications of supplemental dismissal order (.2); correspond with K. Starling and J. Stevens regarding same (.2).	0.80	500.00
09/26/2024	MBD	Review and revise bid packages and terms (1.0); conference with J. Tanenbaum regarding sale process and issues (.6); conference with Trustee team and PH team regarding case status and strategy (.5); correspond with J. Tanenbaum and K. Toney regarding sale order and supplemental dismissal order (.1); continue draft motion to sell IP assets and related exhibits and order (3.0); multiple correspondence with J. Tanenbaum regarding IP assets auction (.3); correspond with A. Nalley regarding form APA (.1); correspond with M. Webb and E. Garfias regarding sale notice (.1); locate service addresses for executory contract counterparties and revise related exhibits (2.0).	7.70	4,812.50
09/26/2024	JWW	Meet with G. Sarda regarding research issues regarding trusts (.5); conference with Trustee team regarding action items for sale and case (.8); further meeting with G. Sarda (.2); several emails regarding sale issues and issues with Western District case (.3); meet with J. Tinkham and emails regarding payment of professional fees and order regarding same (.3).	2.10	1,984.50

PORTER HEDGES LLP

Client: CHRIS MURRAY, CHAPTER 7 TRUSTEE
 Matter: Alex Jones

Invoice Date: October 17, 2024
 Invoice Num.: 569275
 Matter Number: 018577-0001

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/26/2024	AKN	Conder with M. Dearman regarding court approval on asset sale and related APA.	0.30	270.00
09/26/2024	GVS	Confer with J. Wolfshohl regarding case background (.7); attend weekly call with Trustee (.8); email exchanges with J. Wolfshohl regarding trust analysis and legal research (.1).	1.60	800.00
09/26/2024	KLS	Weekly Teams call with J. Wolfshohl, J. Stevenson, M. Dearman, and Trustee.	0.70	402.50
09/27/2024	MBD	Correspond with J. Tanenbaum regarding sale notice (.1); correspond with M. Webb regarding sale notice service (.1).	0.20	125.00
09/27/2024	GVS	Confer with J. Wolfshohl and K. Starling regarding legal research (.3); review transcript from 6/14 hearing (3.1).	3.40	1,700.00
09/27/2024	JWW	Emails and phone conferences regarding finalizing pleadings for Western District case and issues with sale.	0.80	756.00
09/27/2024	KLS	Finalize for filing Trustee's Motions to Transfer Venue and Response to Plaintiffs' Motions to Remand and associate exhibits for each.	7.40	4,255.00
09/27/2024	MLW	Email exchanges with M. Dearman regarding Sale Notice (.2); confer with E. Garfias regarding filing same (.1); coordinate mailing of Sale Notice with vendor for printing/mailing (.2); email exchanges with K. Starling regarding Motions to Transfer (.3); confer with K. Starling regarding same (.3); receive/review and file (.5); confer with E. Garfias regarding filing responses to Motion to Remand (.2).	1.80	837.00
09/27/2024	EG	Correspondence on draft and filing logistics of notice of FSS Sale (.2); receive, review, and electronically file same with court (.3); download and circulate filed version (.1); update file (.1).	0.70	283.50
09/27/2024	EG	Correspondence on draft and filing logistics of responses to remand (.4); continuous monitoring of emails for status of same (.9); receive, review, and electronically file same with court (.8); download and circulate filed	2.40	972.00

PORTER HEDGES LLP

Client: CHRIS MURRAY, CHAPTER 7 TRUSTEE
 Matter: Alex Jones

Invoice Date: October 17, 2024
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		versions (.2); update file (.1).		
09/29/2024	MBD	Begin draft motion to ratify employment and compensation of FSS professionals.	0.20	125.00
09/30/2024	MBD	Correspond with K. Starling regarding assignments and next steps (.1); continue draft employment ratification motion (.1); correspond with J. Tanenbaum regarding NDA and information requests (.1).	0.30	187.50
Total			202.50	\$130,496.00

Total Services **\$130,496.00**

Timekeeper Summary

<u>Initials</u>	<u>Name</u>	<u>Timekeeper Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JWW	Joshua W. Wolfshohl	Partner	36.20	945.00	34,209.00
AKN	Adam K. Nalley	Partner	0.30	900.00	270.00
MBD	Michael B. Dearman	Associate	52.30	625.00	32,687.50
JTS	Jordan T. Stevens	Associate	40.00	595.00	23,800.00
KLS	Kenesha L. Starling	Associate	53.20	575.00	30,590.00
GVS	Grecia V. Sarda	Associate	5.00	500.00	2,500.00
MLW	Mitzie L. Webb	Paralegal	2.70	465.00	1,255.50
EG	Eliana Garfias	Paralegal	12.80	405.00	5,184.00
Total			202.50		\$130,496.00

Cost Summary

<u>Description</u>	<u>Amount</u>
Computer Assisted Legal Research	2,291.91
Delivery Service	48.00
Foreign Associate Fees	1,471.08
Reproduction Services	1,025.50
Total Disbursements	\$4,836.49

Total This Invoice **\$135,332.49**

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 7
ALEXANDER E. JONES,	§	
	§	Case No. 22-33553 (CML)
Debtor.	§	
	§	

**FIFTH MONTHLY FEE STATEMENT OF PORTER HEDGES LLP, AS BANKRUPTCY
COUNSEL FOR CHAPTER 7 TRUSTEE, CHRISTOPHER R. MURRAY, FOR ALLOWANCE
OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
OCTOBER 1, 2024 THROUGH OCTOBER 31, 2024**

Name of Applicant:	Porter Hedges LLP, as proposed Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray
Date of Retention Order:	July 30, 2024 (Doc. No. 792) ¹
Period for which Fees and Expenses are Incurred:	October 1, 2024 through and including October 31, 2024
Interim Fees Incurred:	\$159,590.50
Interim Payment of Fees Requested (80%):	\$127,672.40
Interim Expenses Incurred:	\$4,848.08
Total Fees and Expenses Due:	\$132,520.48

This is the Fifth Monthly Fee Statement.

¹ The Trustee's application to employ Porter Hedges was filed at Docket No. 756.

Porter Hedges LLP (“Porter Hedges”), as Bankruptcy Counsel for the Chapter 7 Trustee, Christopher R. Murray (the “Trustee”), submits this Fifth Monthly Fee Statement (the “Fee Statement”) for the period from October 1, 2024 through October 31, 2024 (the “Application Period”) in accordance with the proposed *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Trustee* [Docket No. 793] (the “Interim Compensation Order”).

Porter Hedges requests compensation for professional services rendered in the amount of \$159,590.50 (the “Fees”), and for reimbursement of out-of-pocket expenses incurred in the amount of \$4,848.08 (the “Expenses”), for the period from October 1, 2024 through October 31, 2024. Eighty percent (80%) of the fees equals \$127,672.40 and one hundred percent (100%) of the Expenses equals \$4,848.08 for a total requested amount of \$132,520.48.

Summaries of the calculations for these fees by project category and expenses are attached hereto as **Exhibit 1** and **Exhibit 2**, respectively. A summary of the time expended by Porter Hedges attorneys and support staff, together with their respective hourly rates, is attached hereto as **Exhibit 3**. Porter Hedges’ invoice for the Application Period is attached hereto as **Exhibit 4**.

WHEREFORE, Porter Hedges respectfully requests payment and reimbursement in accordance with the procedures set forth in the proposed Interim Compensation Order (*i.e.*, payment of eighty percent (80%) of the compensation sought, in the amount of \$127,672.40 and reimbursement of one hundred percent (100%) of expenses incurred in the amount of \$4,848.08 in the total amount of \$132,520.48.

Dated: November 6, 2024
Houston, Texas

Respectfully Submitted,

By: /s/ Joshua W. Wolfshohl

PORTER HEDGES LLP

Joshua W. Wolfshohl (TX Bar No. 24038592)

1000 Main St., 36th Floor

Houston, Texas 77002

Telephone: (713) 226-6000

Facsimile: (713) 226-6248

jwolfshohl@porterhedges.com

***Counsel for the Chapter 7 Trustee,
Christopher R. Murray***

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on November 6, 2024.

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl

EXHIBIT 1

SUMMARY OF TIME EXPENDED BY PROJECT CATEGORY

Project Category	Total Hours	Total Fees Requested
Asset Analysis/Recovery	213.40	145,288.50
Case Administration	10.00	4,411.50
Employment/Fee Application	3.50	2,187.50
Litigation/Contested Matters	11.80	7,703.00
TOTAL	238.70	159,590.50

EXHIBIT 2

SUMMARY OF OUT-OF-POCKET EXPENSES

Expenses	Cost
Computer Assisted Legal Research	1,286.82
Computer Services	2,283.80
Reproduction	128.10
Reproduction Services	1,052.52
Working Meals	96.84
TOTAL	4,848.08

EXHIBIT 3**SUMMARY OF TIME EXPENDED BY ATTORNEYS AND SUPPORT STAFF**

Professional	Hourly Rate	Total Hours
Derek V. Forinash	\$950.00	2.20
Joshua W. Wolfshohl	\$945.00	30.90
Adam K. Nalley	\$900.00	25.70
Christine M. McMillan	\$785.00	2.60
Matthew R. Baughman	\$750.00	3.20
William R. Stukenberg	\$725.00	4.80
Michael B. Dearman	\$625.00	72.40
Jordan T. Stevens	\$595.00	6.40
Kenesha L. Starling	\$575.00	42.20
Daisy Puente	\$565.00	5.80
Grecia V. Sarda	\$500.00	32.70
Carey A. Sakert	\$470.00	1.50
Mitzie L. Webb	\$465.00	3.60
Janice M. Thomas	\$420.00	1.10
Eliana Garfias	\$405.00	3.60
TOTAL		238.70

PORTER HEDGES LLP

A REGISTERED LIMITED LIABILITY PARTNERSHIP

DEPT. 510
P.O. BOX 4346
HOUSTON, TEXAS 77210-4346

TELEPHONE (713) 226-6000
TELECOPIER (713) 228-1331

ATTN: CHRIS MURRAY

Invoice Date: November 05, 2024
Invoice Num.: 569800
Matter Number: 018577-0001
Billing Attorney: Joshua W. Wolfshohl
Tax ID: #74-2174193

Matter: Alex Jones

For professional services rendered and costs incurred through October 31, 2024

Professional Services	159,590.50
Disbursements	4,848.08
Total Amount Due	\$164,438.58

PORTER HEDGES LLP

Client: CHRIS MURRAY, CHAPTER 7 TRUSTEE
 Matter: Alex Jones

Invoice Date: November 05, 2024
 Invoice Num.: 569800
 Matter Number: 018577-0001

Time Detail

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/01/2024	MBD	Continue draft motion to ratify employment and compensation of BlackBriar (.8); reviewing employment of BlackBriar in FSS chapter 11 proceeding (.2).	1.00	625.00
10/01/2024	JWW	Emails and phone conference with C. Murray and E. Jones regarding open issues with sale and Western District case (.5); emails with Texas plaintiffs' regarding same (.2).	0.70	661.50
10/01/2024	KLS	Continue analysis of trusts owned by Alex Jones for Trustee.	1.50	862.50
10/02/2024	JWW	Review fee order and emails with M. Haseldon (.2); emails regarding turnover order and Western District case status (.4).	0.60	567.00
10/02/2024	GVS	Email exchanges with K. Starling regarding legal research on trusts.	0.20	100.00
10/02/2024	KLS	Continue analysis of trusts owned by Alex Jones for Trustee.	7.40	4,255.00
10/02/2024	JTS	Conduct legal research and analysis regarding appeal of supplemental dismissal order.	1.30	773.50
10/03/2024	GVS	Email J. Wolfshohl regarding weekly Chapter 7 Trustee call (.1); attend same (1.0); email exchanges with K. Starling regarding legal research (.2); review [REDACTED] (.2); confer with J. Wolfshohl and M. Dearman regarding PQPR (.2); review premarital agreement (1.8); review disclosure statement (.5); email exchanges regarding state court lawsuit and receivership (.1).	4.10	2,050.00
10/03/2024	AKN	Confer with M. Dearman regarding sale of assets and related considerations for asset purchase agreement (.2); begin to draft and revise form of asset purchase agreement for asset sales (2.2).	2.40	2,160.00
10/03/2024	JWW	Meet with M. Dearman regarding sale issues (.3); weekly call with Trustee team (1.0); emails with J.	1.80	1,701.00

PORTER HEDGES LLP

Client: CHRIS MURRAY, CHAPTER 7 TRUSTEE
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		Martin regarding status of turnover order issues (.2); emails with K. Starling regarding motion to expedite consideration of turnover and review local rules regarding same (.3).		
10/03/2024	MBD	Revise motion to sell Jones IP assets (.4); review transcripts and docket entries related to publishing agreement assumption (.5); conference with J. Tanenbaum, K. Toney, and C. Murray regarding auction and asset sale (.5); conference with Trustee team and PH team regarding case status (1.0); conference with A. Nalley regarding form APA and corporate issues (.4); review and analyze document production related to corporate issues (.5); correspond with PH team regarding state court receivership motion (.2).	3.50	2,187.50
10/03/2024	KLS	Weekly Teams call with Trustee.	1.00	575.00
10/03/2024	CAS	Communications with vendor regarding adding M. Dearman as reviewer.	0.20	94.00
10/03/2024	JTS	Prepare for and attend strategy session with members of the Porter Hedges and Trustee Teams (1); Continue conducting legal research and analysis in connection with a potential appeal of the Supplemental Dismissal Order (.8).	1.80	1,071.00
10/04/2024	MBD	Correspond with A. Nalley regarding resolutions and form APA (.2); compile documents related to corporate issues (.2); revise Jones IP assets sale motion (.1); correspond with E. Jones regarding same (.2); correspond with J. Tanenbaum regarding press release and media inquiries (.1); revise press release and media responses (.5).	1.30	812.50
10/04/2024	GVS	Review premarital agreement (.3); compile transfer of assets to evaluate potential avoidance claims (.4).	0.70	350.00
10/04/2024	JWW	Conference with W. Stukenberg and K. Starling regarding FSS employment issues (.5); conference with J. Martin and several follow-up communications regarding status of Western District case and turnover	2.10	1,984.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		order (1.0); conference with C. Murray and E. Jones regarding strategy for Western District case (.4); follow-up emails regarding same (.1); conference with M. Dearman regarding sale issues (.1).		
10/04/2024	AKN	Continue to draft and revise APA for sale of assets (1.2); review bid and sale materials related to the same (.3).	1.50	1,350.00
10/04/2024	KLS	Teams call with J. Wolfshohl and W. Stukenberg regarding potential labor and employment issues.	0.40	230.00
10/04/2024	WRS	Develop strategy regarding retaining employees during bankruptcy.	1.00	725.00
10/05/2024	GVS	Review premarital agreement (.9); review ratification of same (.5); compile transfer of assets to evaluate potential avoidance claims (1.1); circulate list of same to K. Starling (.2).	2.70	1,350.00
10/07/2024	JWW	Conference call regarding hearing strategy and sale (.6); conference with counsel for Texas Plaintiffs (.2); prepare for hearing (.4); attend hearing on removal/transfer of venue (.4); emails regarding same (.2); review notice of removal of CT receivership action and emails with Trustee regarding same (.3).	2.10	1,984.50
10/07/2024	GVS	Review email from J. Wolfshohl regarding Trustee's motion to transfer venue.	0.10	50.00
10/07/2024	AKN	Continue to draft and revise asset purchase agreements for asset sales and review related documentation.	1.50	1,350.00
10/07/2024	MBD	Correspond with E. Jones regarding call with IP counsel (.2); review and revise bid package terms (1.6); correspond with J. Tanenbaum regarding same (.3); correspond with Skyhorse Publishing regarding publishing agreement (.2); attend to correspondence regarding IP issues (.2); conference with J. Wolfshohl regarding status conference W.D. Tex. (.1); correspond with PH team regarding status conference (.2).	2.80	1,750.00
10/07/2024	KLS	Teams call with W. Stukenberg and Trustee regarding labor and employment issues (.5); Teams call with J.	1.50	862.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		Wolfshohl and Trustee regarding Western District Status Conference (.5); attend Western District Status Conference (.5)		
10/07/2024	MLW	Email exchanges with K. Starling regarding deadline to object to contested motions (.1); review Western District Local Rules and update K. Starling regarding same (.2).	0.30	139.50
10/07/2024	WRS	Provide guidance regarding retention agreements.	1.00	725.00
10/08/2024	MBD	Review notice of appeal and correspond with PH team regarding same.	0.40	250.00
10/08/2024	AKN	Continue to revise and draft asset purchase agreements for sale of assets.	2.30	2,070.00
10/08/2024	GVS	Confer with K. Starling, M. Dearman, and J. Stevens regarding Texas plaintiff's notice of appeal.	0.30	150.00
10/08/2024	JWW	Emails regarding status of removed case (.2); review docket and appeal and emails regarding same (.1); emails regarding sale issues and next steps with motion to sell in individual case (.2); emails regarding IP issues (.1).	0.60	567.00
10/08/2024	CAS	Prepare FTP upload link for Jones Murray to forward documents to K. Starling (.2); set up e-discovery vendor with access to FTP uploads and confer with K. Dvorak regarding same (.3).	0.50	235.00
10/09/2024	GVS	Review email exchanges between M. Dearman and J. Tanenbaum regarding response to media inquiries.	0.10	50.00
10/09/2024	MBD	Correspond with Paul Weiss team regarding information access (.1); correspond with Trustee regarding same (.1); correspond with J. Tanenbaum regarding bid packages (.1); revise media inquiry response and correspond with J. Tanenbaum and C. Murray regarding same (.1); correspond with J. Wolfshohl regarding Jones assets (.1).	0.50	312.50
10/10/2024	JWW	Emails regarding sale issues and other related matters in case.	0.30	283.50

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/11/2024	GVS	Review email from M. Dearman regarding drafting 9019 motion (.1); confer with M. Dearman regarding same (.1); review [REDACTED] in preparation to draft 9019 motion (.9).	1.10	550.00
10/11/2024	MBD	Conference with J. Tanenbaum and K. Toney regarding sale issues (.5); conference with J. Wolfshohl regarding potential settlements (.2); conference and correspond with G. Sarda regarding draft 9019 motion and order (.3); conference with J. Tanenbaum regarding NDAs (.2).	1.20	750.00
10/11/2024	JWW	Conference with C. Murray regarding [REDACTED] (.5); emails and phone conference with M. Dearman regarding same (.3).	0.80	756.00
10/12/2024	GVS	Continue reviewing Connecticut plaintiffs' Motion for Summary Judgment.	0.60	300.00
10/12/2024	MBD	Multiple correspondence with J. Tanenbaum and interested party regarding disclosures timeline and sale issues.	0.30	187.50
10/13/2024	MBD	Review demand letter (.1); correspond with C. Murray, E. Jones, and J. Wolfshohl regarding same (.1); correspond with D. Forinash regarding trademark issues (.2); update Jones IP sale motion (.1); correspond with C. Murray regarding same (.1).	0.60	375.00
10/13/2024	GVS	Continue reviewing Connecticut plaintiffs' Motion for Summary Judgment (.3); begin drafting 9019 motion (.9).	1.20	600.00
10/14/2024	GVS	Continue drafting 9019 motion (3.7); confer with M. Dearman regarding 9019 motion (.1); circulate draft of same to M. Dearman for review (.1).	3.90	1,950.00
10/14/2024	JWW	Emails regarding status of settlements and drafts of 9019 motions (.3); emails regarding IP issues and conference with M. Dearman regarding same (.7); emails regarding discussions with CT plaintiffs (.2); emails regarding sale	1.30	1,228.50

PORTER HEDGES LLP

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		materials and requests for information (.1).		
10/14/2024	MBD	Correspond with A. Nalley regarding form APA (.1); correspond with D. Forinash and J. Pierce regarding trademark issues (.1); multiple correspondence with C. Murray, E. Jones, and J. Wolfshohl regarding same (.3); conference with G. Sarda regarding draft 9019 order (.1); correspond with K. Starling regarding potential fraudulent transfer claims (.2); correspond with M. Webb and E. Garfias regarding emergency hearing (.2); revise Jones IP Asset sale motion (.8); conference with K. Starling regarding employment agreements (.2); conference with J. Wolfshohl regarding same (.2); correspond with C. Murray regarding trademark issues (.1); draft response letter to opposing counsel regarding trademarks (1.5); review and revise draft 9019 motion and begin draft order (2.0); analyze case law governing trademark issues (.5).	6.30	3,937.50
10/14/2024	MLW	Email exchanges with M. Dearman regarding obtaining court's availability for emergency hearing on sale motion.	0.10	46.50
10/14/2024	DVF	Review proposed trademark infringement letter and analyze trademark use for potential fair use.	1.00	950.00
10/14/2024	EG	Review docket updates for scheduled hearings and upcoming deadlines.	0.20	81.00
10/14/2024	KLS	Review Free Speech Systems and Alex Jones employment contracts for Trustee.	4.50	2,587.50
10/14/2024	WRS	Provide guidance regarding retention agreements.	0.80	580.00
10/15/2024	GVS	Review M. Dearman's edits and make modifications to 9019 motion (1.5); begin drafting settlement order (3.5); circulate same to M. Dearman for edits (.1).	5.10	2,550.00
10/15/2024	MBD	Review and revise draft 9019 motion and draft order (2.5); multiple correspondence with G. Sarda regarding same (.2); conference with J. Tanenbaum regarding leases (.2); review document production, pleadings, and	4.50	2,812.50

PORTER HEDGES LLP

Client: CHRIS MURRAY, CHAPTER 7 TRUSTEE
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		schedules for lease information (.5); correspond with J. Tanenbaum regarding same (.1); finalize Jones IP Assets sale motion (.5); multiple correspondence with J. Wolfshohl and C. Murray regarding same (.2); conference and correspond with M. Webb and E. Garfias regarding Jones IP Assets sale motion service and filing (.3).		
10/15/2024	JWW	Emails and conference regarding open settlements in A. Jones case and related issues (.3); emails and phone conference with M. Dearman regarding IP property sale issues (.3); emails with CT counsel regarding call to discuss proposal (.1); conference with C. Murray regarding same (.1); conference with CT plaintiffs regarding status of estate assets, PQPR settlement and overall case settlement (.8); review PQPR order and emails regarding same (.2).	1.80	1,701.00
10/15/2024	AKN	Draft and revise asset purchase agreement.	4.70	4,230.00
10/15/2024	MLW	Email exchanges with M. Dearman regarding Court's availability for hearing on emergency motion (.2); confer with Court Case Manager and update M. Dearman regarding same (.2); forward filed Emergency Motion to Case Manager (.2).	0.60	279.00
10/15/2024	EG	Correspondence on updating service list (.2); further emails on filing logistics of emergency sale motion (.2); receive, review, and electronically file same with court (.3); download and circulate filed version (.1).	0.80	324.00
10/16/2024	MBD	Draft notice of hearing (.2); revise 9019 motion and order (.8); multiple correspondence with C. Murray and G. Sarda regarding same (.2); conference with J. Wolfshohl regarding case status and IP issues (.5); correspond with C. Murray regarding Jones IP asset sale order (.2); review and revise press responses from opposing counsel (.2); correspond with C. Murray and E. Jones regarding same (.1); revise form APA (2.5); conference with J. Tanenbaum regarding internet domains (.3); review Debtor's schedules of IP assets (.2);	6.40	4,000.00

PORTER HEDGES LLP

Client: CHRIS MURRAY, CHAPTER 7 TRUSTEE
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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		correspond with J. Wolfshohl and A. Nalley regarding draft form APA (.1); analyze case law governing property of the estate issues (1.1).		
10/16/2024	JWW	Review PQPR motion and provide comments to same (.5); review comments from C. Murray and emails regarding filing of same and status of CT/TX settlement (.4); conference with R. Chappel regarding receivership action (.4); emails regarding open sale issues (.3); conference with M. Dearman regarding same (.3).	1.90	1,795.50
10/16/2024	GVS	Review email and attachments from M. Dearman regarding 9019 motion and order (.3); review Trustee's edits to same (.2); make modifications to same and circulate to M. Dearman for review (1.3); check-in call with M. Dearman (.1); email exchanges with chapter 7 Trustee (.1); email M. Webb and E. Garfias regarding filing emergency motion (.1); review M. Dearman's redlines of 9019 motion and order (.2); confer with M. Dearman regarding drafting motion to enforce the stay (.2).	2.50	1,250.00
10/16/2024	EG	Coordinate service of emergency motion.	0.30	121.50
10/17/2024	AKN	Review and revise draft of APA (1.2); revise to incorporate certain comments from M. Dearman (.8); confer with M. Dearman regarding the same (.2).	2.20	1,980.00
10/17/2024	JWW	Phone conference with Trustee team regarding open sale issues and receivership (.4); further conference with M. Dearman (.1); emails regarding numerous open issues with IP and other matters (.4); conference with counsel for prospective buyer (.4); further call with M. Dearman (.1); follow-up emails regarding issues for discussion on Friday call (.1); review and finalize fee statement (.2).	1.70	1,606.50
10/17/2024	GVS	Confer with K. Starling, M. Dearman, and J. Stevens regarding Lafferty hearing today (.1); confer with M. Dearman regarding potential emergency motion filing tomorrow (.1).	0.20	100.00
10/17/2024	MBD	Review and analyze domain name issues (.5);	2.40	1,500.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		correspond with J. Wolfshohl regarding same (.2); conference with D. Blabey and J. Wolfshohl regarding auction (.1); conference with J. Tanenbaum and K. Toney regarding auction and sale process (.5); conference with potential bidder (.2); review data room information (.2); conference with J. Wolfshohl regarding bidding process and case status (.2); finalize and send trademark infringement letter (.2); conference and correspond with M. Webb regarding emergency hearing (.3).		
10/17/2024	MLW	Email exchanges with M. Dearman regarding hearing on Emergency Motion to Sell (.4); confer with Court Case Manager regarding same (.2); receive/file Notice of Hearing with copy to Court Case Manager (.3); coordinate printing/mailing of Notice (.2).	1.10	511.50
10/17/2024	EG	Correspondence on filing logistics of notice of hearing (.2); continuous monitoring of emails for status of same (.5); receive, review, and electronically file same with court (.2); download and circulate filed version (.1); update file (.1).	1.10	445.50
10/17/2024	KLS	Complete review of Free Speech Systems and Alex Jones employment contracts for Trustee.	1.20	690.00
10/17/2024	CAS	Receive additional client documents and coordinate with vendor to load new documents into database.	0.30	141.00
10/18/2024	MBD	Conference with Trustee team and PH team regarding Alex Jones case (.8); revise form APA and correspond with A. Nalley regarding same (.5); correspond with C. Murray, J. Tanenbaum, and K. Toney regarding same (.1); correspond with PH team, C. Murray, and E. Jones regarding draft 9019 order (.3); conference with C. Murray, E. Jones, and K. Starling regarding same (.3); review and revise draft 9019 order (.5); begin draft PH first interim fee application (.5); conference with counsel to PQPR regarding draft case status (1.0); correspond with L. Lieberman regarding auction process (.2); multiple correspondence with interested party	4.80	3,000.00

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		regarding NDA (.3); conference with J. Wolfshohl regarding PQPR call (.2); correspond with J. Tanenbaum regarding interested party (.1).		
10/18/2024	GVS	Attend weekly check-in call with PH team and Chapter 7 Trustee.	0.80	400.00
10/18/2024	AKN	Revise draft of asset purchase agreement to post-closing covenant regarding business premises and related matters (.7); confer with M. Dearman regarding draft of agreement (.2).	0.90	810.00
10/18/2024	JWW	Emails and conference regarding various open issues with sale and settlements (.7); conference with Trustee team regarding open issues in case (.6); several follow-up emails (.2).	1.50	1,417.50
10/18/2024	MLW	Email exchange with M. Dearman regarding possible filing of Emergency 9019 Motion.	0.20	93.00
10/18/2024	KLS	Weekly status with Trustee (.5); calls with regarding PQPR adversary (1.4); review Trustee's motion [REDACTED] (.5).	2.40	1,380.00
10/18/2024	JTS	Prepare for and attend strategy session with members of the Porter Hedges and Trustee Teams.	0.90	535.50
10/20/2024	MBD	Correspond with potential bidder regarding NDA.	0.10	62.50
10/20/2024	GVS	Begin drafting motion to enforce stay.	4.70	2,350.00
10/21/2024	GVS	Continue drafting motion to enforce automatic stay.	0.60	300.00
10/21/2024	MBD	Continue draft first interim PH fee application (2.5); conference with potential bidder regarding NDA (.2); revise NDA and correspond with C. Murray regarding same (.1); conference with C. Murray regarding case strategy (.2); conference with C. Murray, E. Jones, and K. Starling regarding potential settlement (.3); correspond with J. Wolfshohl regarding same (.2); conference with J. Tanenbaum regarding form APA (.5); conference with E. Jones regarding case issues and strategy (1.0); revise and redline draft 9019 order and	7.10	4,437.50

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		correspond with C. Murray, E. Jones, J. Wolfshohl and K. Starling regarding same (1.0); begin revising form APA (.7); analyze settlement terms (.4).		
10/21/2024	KLS	Teams call with Trustee regarding PQPR Issues.	0.30	172.50
10/22/2024	AKN	Review revisions to draft of asset purchase agreement (.8); correspond with M. Dearman regarding the same (.1).	0.90	810.00
10/22/2024	JWW	Emails and conference with C. Murray and Trustee team regarding IP issues and sale.	0.80	756.00
10/22/2024	MBD	Continue revising form APA (.3); attend to correspondence with C. Murray, E. Jones, and J. Wolfshohl regarding sale issues (.2); multiple correspondence with [REDACTED] regarding NDA (.2); correspond with potential bidder regarding bid term inquiries (.1); correspond with J. Tanenbaum regarding same (.1); conference with J. Tanenbaum regarding sale process (.3); correspond with A. Nalley regarding additional assets (.2).	1.40	875.00
10/22/2024	EG	Correspondence on draft and filing logistics of witness/exhibit list.	0.20	81.00
10/22/2024	KLS	Prepare Trustee's witness and exhibit list, including associated exhibits, for October 25th Hearing.	1.50	862.50
10/22/2024	WRS	Revise retention agreements.	1.00	725.00
10/23/2024	GVS	Begin drafting proposed order for motion to enforce stay.	0.90	450.00
10/23/2024	MBD	Conference with A. Nalley regarding APA changes (.7); multiple correspondence with J. Tanenbaum and C. Murray regarding domain names (.2); analyze issues with potential settlements (1.5); correspond with J. Wolfshohl and K. Starling regarding same (.1); review witness and exhibit list and correspond with K. Starling regarding same (.1); analyze case law related to settlement issues (1.8); review changes to form APA and correspond with C. Murray and J. Tanenbaum regarding	3.90	2,437.50

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		same (.3); pull terms and conditions and privacy policies from Infowars sites (.2); circulate same to interested parties (.1); draft and circulate meeting agenda to Trustee team and PH team (.1).		
10/23/2024	AKN	Review mark-up of APA and emergency motion regarding sale (1.2); confer with M. Dearman regarding APA and revision to certain provisions in the same (.3); revise draft of APA (.8).	2.30	2,070.00
10/23/2024	EG	Follow up emails on filing logistics and status of finalizing witness/exhibit list (.2); receive, review, and electronically file same with court (.4); download and circulate filed version (.1); update file (.1).	0.80	324.00
10/23/2024	MLW	Email exchanges with K. Starling regarding witness/exhibit list (.2); review same (.4); confer with E. Garfias regarding filing (.1).	0.70	325.50
10/23/2024	KLS	Finalize exhibits for October 25th Hearing (.5); review term sheet regarding potential settlement (1.0); prepare initial draft employee and contractor agreements regarding wind-down of Free Speech Systems (8.5).	10.00	5,750.00
10/24/2024	GVS	Attend weekly check-in call with PH team and Chapter 7 Trustee (1.5); continue drafting motion to enforce stay (1.3); circulate draft of same to M. Dearman (.1).	2.90	1,450.00
10/24/2024	JWW	Review docket and agenda and prepare for weekly call regarding all open matters in case (.3); conference call with Trustee team regarding sale hearing, settlement status and other related matters (1.6); review A. Jones objection and emails and phone conference regarding same (.7); conference call with Trustee team regarding comments from A. Jones and hearing preparation (.6); follow-up emails regarding same (.2); further review of revised order and emails regarding filing same and status of hearing (.3).	3.70	3,496.50
10/24/2024	MBD	Conference with Trustee team and PH team regarding case status and strategy (1.4); conference with J. Tanenbaum, C. Murray, and E. Jones regarding sale	9.10	5,687.50

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		process (.4); review and analyze organizational and trust documents (1.0); multiple correspondence with M. Baughman and A. Nalley regarding same (.6); correspond with K. Starling regarding [REDACTED] (.2); analyze limited objection to Jones IP Assets motion (.4); analyze case law governing executory contract issues (.8); analyze and revise proposed Jones IP Assets order (1.5); multiple correspondence with Trustee team and PH team regarding same (.5); conference with C. Murray, E. Jones, J. Wolfshohl and K. Starling regarding same (.8); draft witness outline for Jones IP Assets sale hearing (1.5).		
10/24/2024	AKN	Review entity documents for [REDACTED] (1.5); confer with M. Baughman regarding [REDACTED] matters in connection with the same (.3).	1.80	1,620.00
10/24/2024	KLS	Status call via Teams with Trustee (1.5); Teams call with Trustee regarding proposed sale order (.5); review employee benefits information (1.3).	3.30	1,897.50
10/24/2024	CAS	Email communications with K. Starling regarding correct custodian and source data for new documents to be added to database.	0.20	94.00
10/24/2024	JTS	Prepare for and attend extended strategy session with members of the Porter Hedges and Trustee Teams.	1.50	892.50
10/24/2024	MRB	Review documents relating to [REDACTED] and related entities (1.3); discuss with A. Nalley (.2).	1.50	1,125.00
10/25/2024	AKN	Confer with M. Baughman and M. Dearman regarding [REDACTED] (.2); begin to review note and security agreement to analyze options [REDACTED] (.6).	0.80	720.00
10/25/2024	MBD	Correspond and conference with K. Starling regarding final proposed order and filing (.3); attend hearing on Jones IP Assets (.4); conference with J. Wolfshohl	4.00	2,500.00

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		regarding same (.2); analyze case law governing property of estate issues (1.5); attend to numerous correspondence regarding Jones IP Assets (1.0); correspond with A. Nalley regarding corporate analysis (.2); revise form APA (.3); correspond with J. Tanenbaum regarding same (.1).		
10/25/2024	JWW	Prepare for hearing (1.0); attend hearing and follow-up conference with client regarding same (1.1); follow-up conference and emails with M. Dearman and Trustee team regarding next steps with IP assets (.5).	2.60	2,457.00
10/25/2024	EG	Correspondence on filing logistics of Sale Motion Proposed Order.	0.20	81.00
10/25/2024	KLS	Draft proposed and redline sale order (1.2); call regarding employee contracts (.5); (continue revising employee contracts (3.1).	4.80	2,760.00
10/25/2024	MLW	Email exchanges with K. Starling regarding proposed Order - Sale Motion (.2); receive and file same with copy to Court Case Manager (.4).	0.60	279.00
10/25/2024	CAS	Email communications with vendor regarding organization and identification of data sets within database.	0.30	141.00
10/25/2024	MRB	Continue review of documents relating to [REDACTED] and related entities (.9); discuss with A. Nalley and M. Dearman (.3).	1.20	900.00
10/26/2024	AKN	Review note and security agreement to [REDACTED] (1.3); confer with C. McMillan regarding the same (.2).	1.50	1,350.00
10/28/2024	AKN	Confer with C. McMillan regarding review of note and security agreement and [REDACTED] (.2); continue to review documents to analyze the same (.5); review summary and analysis prepared by C. McMillan (.6).	1.30	1,170.00
10/28/2024	CMM	Review security agreement and note [REDACTED] and prepare email summary of	2.60	2,041.00

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		findings.		
10/28/2024	JWW	Emails regarding next steps with sale process (.3); review and revise settlement term sheet and emails regarding same (.6); conference with E. Jones regarding open sale issues (.4); emails with team regarding discussion with Tranzon (.1).	1.40	1,323.00
10/28/2024	MBD	Conference with D. Forinash regarding intellectual property issues (.4); conference with C. Murray regarding case strategy (.3); analyze executory contract terms (1.0); analyze case law governing assignability (1.2); review and revise potential settlement agreement (.5).	3.40	2,125.00
10/28/2024	DVF	Researching IP issues associated with ownership of social media accounts and internet domain names and discussing with M. Dearman.	1.20	1,140.00
10/29/2024	JWW	Emails regarding next steps with sale and potential resolution with Debtor (.4); conference with Tranzon regarding same (.6); further call with Trustee team regarding next steps (.8); review revised agreed order (.1); emails with counsel for X regarding account transfer issues (.2).	2.10	1,984.50
10/29/2024	MBD	Conference with E. Jones, J. Wolfshohl, and J. Tanenbaum regarding sale strategy (.3); conference with A. Nalley regarding case status and strategy (.2); analyze case law governing intellectual property sales (1.0); conference with C. Murray, E. Jones, and J. Wolfshohl regarding asset sales (.4); conference with E. Jones regarding agreed order and sale issues (.5); draft agreed order (.9); correspond with C. Murray, E. Jones, and J. Wolfshohl regarding same (.1).	3.40	2,125.00
10/30/2024	JWW	Conference with counsel for X regarding sale of accounts (.4); numerous follow-up emails and conference with M. Dearman regarding same and sale of business assets from personal estate (1.1).	1.50	1,417.50
10/30/2024	KLS	Teams call with W. Stukenberg regarding draft retention	1.50	862.50

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		agreements (.5); revise draft retention agreements per Teams call with W. Stukenberg (1.0).		
10/30/2024	MBD	Attend to correspondence regarding with Trustee team and PH team regarding Jones IP assets (.1); analyze case law regarding same (1.0); correspond with E. Jones regarding analysis of same (.2); multiple correspondence with K. Starling regarding employment agreements (.2);	1.50	937.50
10/30/2024	WRS	Provide strategy regarding retention agreements.	1.00	725.00
10/31/2024	JMT	Attention to matters concerning Westlaw research with regard to [REDACTED].	1.10	462.00
10/31/2024	AKN	Confer with C. McMillan regarding note and collateral and process for foreclosing on the same under UCC (.2); draft and revise summary of note and security agreement provisions and analysis of same with respect to PQPR equity interests (1.3); correspond with M. Dearman regarding the same (.1).	1.60	1,440.00
10/31/2024	KLS	Weekly Teams call with the Trustee.	0.90	517.50
10/31/2024	JTS	Prepare for and attend strategy session with members of the Porter Hedges and Trustee Teams.	0.90	535.50
10/31/2024	MBD	Conference with J. Wolfshohl regarding fee application (.1); conference with Trustee team and PH team regarding case status and strategy (.9); review analysis of note and security agreement (.4); analyze case law on trusts (.8); conference with E. Jones regarding potential settlements (.3).	2.50	1,562.50
10/31/2024	DP	Research and summarize [REDACTED].	5.80	3,277.00
10/31/2024	JWW	Several emails and phone conferences regarding open sale issues and IP issues (.5); weekly call with trustee team regarding open issues in case (.8); follow-up emails regarding open issues (.3).	1.60	1,512.00
10/31/2024	MRB	Review email from A. Nalley regarding issues	0.50	375.00

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		concerning [REDACTED] [REDACTED] (.3); discuss with C. McMillin (.2).		
Total			238.70	\$159,590.50

Total Services **\$159,590.50**

Timekeeper Summary

<u>Initials</u>	<u>Name</u>	<u>Timekeeper Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
DVF	Derek V. Forinash	Partner	2.20	950.00	2,090.00
JWW	Joshua W. Wolfshohl	Partner	30.90	945.00	29,200.50
AKN	Adam K. Nalley	Partner	25.70	900.00	23,130.00
CMM	Christine M. McMillan	Partner	2.60	785.00	2,041.00
MRB	Matthew R. Baughman	Partner	3.20	750.00	2,400.00
WRS	William R. Stukenberg	Partner	4.80	725.00	3,480.00
MBD	Michael B. Dearman	Associate	72.40	625.00	45,250.00
JTS	Jordan T. Stevens	Associate	6.40	595.00	3,808.00
KLS	Kenesha L. Starling	Associate	42.20	575.00	24,265.00
DP	Daisy Puente	Associate	5.80	565.00	3,277.00
GVS	Grecia V. Sarda	Associate	32.70	500.00	16,350.00
CAS	Carey A. Sakert	Paralegal	1.50	470.00	705.00
MLW	Mitzie L. Webb	Paralegal	3.60	465.00	1,674.00
JMT	Janice M. Thomas	Paralegal	1.10	420.00	462.00
EG	Eliana Garfias	Paralegal	3.60	405.00	1,458.00
Total			238.70		\$159,590.50

Cost Summary

<u>Description</u>	<u>Amount</u>
Computer Assisted Legal Research	1,286.82
Computer Services	2,283.80
Reproduction	128.10
Reproduction Services	1,052.52
Working Meals	96.84
Total Disbursements	\$4,848.08

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Total This Invoice	\$164,438.58
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